
Sherwood State School

Outside School Hours Care

Policies & Procedures

Manual

Table of Contents

Service Philosophy	5
Required Policies Matrix (Regulation 168)	6
Taking 'Reasonable Steps' to Ensure Policy is Followed	8
Scope of Roles and Responsibilities	9
Definitions	10
Policy Group 1	12
1.1 Educational Program Development and Implementation	13
1.2 Documenting Children's Learning	21
1.3 Sharing the Program and Children's Progress with Families	28
1.4 Excursions, Incursions and Regular Outings	31
1.5 Sleep, Rest and Relaxation	40
1.6 Food and Nutrition	44
1.7 Screen-Time and Media Viewing	51
1.8 Use of Artificial Intelligence (AI) Technology	55
Policy Group 2	61
2.1 Providing a Child Safe Environment	62
2.2 Supervision and Educator Ratios	70
2.3 Safe Arrivals and Departures of Children	77
Arrival and Accountability Flowchart	89
2.4 Incident, Injury, Trauma and Illness	91
2.5 Administration of First Aid	102
2.6 Water Safety	108
2.7 Infectious Diseases	113
2.8 Hygiene, Health and Wellbeing Practices	119
2.9 Medical Conditions in Children	125
2.10 Administration of Medication	139
2.11 Sun Safety	145
2.12 Safe Food Handling, Preparation and Storage (Food Safety Program)	150
2.13 Emergency Evacuation, Lockdown and Drills	157
2.14 Child Protection and Mandatory Reporting	171
2.15 Transportation (Other than Excursions)	183
2.16 Safe Use of Digital Technologies and Online Environments	185
2.17 Child Safety and Wellbeing	195
Policy Group 3	202
3.1 Space and Facilities Requirements	203
3.2 Authority to Occupy Premises	207
3.3 Smoking, Drugs and Alcohol-free Environment	209

3.4 Children's Toileting	213
3.5 Emergency and Safety Equipment.....	216
3.6 Resources and Equipment	218
3.7 Environmental Responsibility and Sustainability.....	222
Policy Group 4.....	225
4.1 Recruitment and Employment of Educators.....	226
4.2 Employee Remuneration and Entitlements.....	233
4.3 Working with Children Checks and (Blue-Card) Management.....	238
4.4 Employee Uniform and Dress Code	242
4.5 Volunteers and Students	245
4.6 Code of Conduct.....	249
4.7 Employee Development and Performance Review	256
4.8 Employee Qualifications – Monitoring Progress	261
4.9 Fitness for Work	263
4.10 Managing Employee Underperformance and Misconduct.....	269
4.11 Prevention of Workplace Bullying, Discrimination and Harassment including Sexual Harassment.....	276
4.12 Employee Grievance.....	282
Policy Group 5.....	287
5.1 Interactions and Relationships with Children.....	288
5.2 Positive Behaviour Support Practices.....	296
5.3 Supporting Complex Behaviours	305
5.4 Supporting Additional Needs with Inclusive Practices	313
5.5 Promoting Protective Behaviours	320
Policy Group 6.....	323
6.1 Access for Families.....	324
6.2 Enrolment and Orientation.....	327
6.3 Bookings and Cancellations	337
6.4 Acceptance and Refusal of Authorisations	342
6.5 Interactions and Communication with Families.....	350
6.6 Community Communication and Participation	355
6.7 Feedback and Complaints Handling	358
6.7.1 Complaint Handling Flowchart.....	364
6.8 Visitors.....	365
6.9 Childhood Immunisation	370
6.10 Children's Property and Belongings.....	373
6.11 Cultural Safety.....	377
Policy Group 7.....	383

7.1 Nominated Supervisor	384
7.2 Determining the Responsible Person.....	388
7.3 Educational Leader	393
7.4 Leading Compliance and Quality Assurance	397
7.5 Governance and Management	404
7.6 Privacy and Confidentiality of Records	413
7.7 Managing Notifications	424
7.8 Policy Development, Review and Implementation	430
7.9 Budgeting, Procurement and Financial Planning	434
7.10 Fees, Statements and Parent Gap Fee Payments	437
7.11 Child Care Subsidy (CCS) and Additional Child Care Subsidy (ACCS) Management and Compliance	443
7.12 Workplace Health and Safety	451
7.13 Service Closure	459
7.14 Social Media and ITC Usage for the Service.....	462
7.15 Self-Assessment and Quality Improvement	467
7.16 CCS Governance and Compliance.....	470

Service Philosophy

The Service's Philosophy has been developed as a foundational principle to the practices of our educators and the delivery of the service to our community. The Philosophy draws upon:

- Educational and Care Services National Law and Regulations
- National Quality Standards
- 'My Time, Our Place' Framework for School Age Care

Philosophy Statement

The Sherwood State School Outside School Hours Care Service aims to support the needs of the children, parents/guardians and staff by creating a nurturing environment and providing quality care at before and after school care plus during holiday periods. We provide fair and versatile opportunities to each child for further development and invite the children to utilise their surroundings within a safe environment to progress in areas such as health and creativity to assist growth in cognitive, physical and social skills.

The daily practices of the service should reflect and reinforce the principles laid out in the United Nations Convention Rights of the Child and the Australian National Quality Framework. Each child is equal and we strive to celebrate their diversity of family culture within our program.

Educators at the service encourage each child to be a valuable member of the community and to make choices and decisions to influence events which have an impact in their world. Children learn and develop skills through active play and direct interaction with their environment. This means children will have the opportunity to engage and make decisions about their activities and how they spend their time, interact with others and use resources on a daily basis. Activities on offer include indoor and outdoor, individual and group play so children can explore and develop a strong sense of self-worth and the value of others. We seek to consider children's opinions and views when programming activities and consider the best interests of the child plus their right to play and learn in a safe, nurturing environment.

We believe in promoting children's emotional wellbeing and resilience; and that happiness, optimism and a sense of fun are key dispositions in developing these. Children are active learners from birth and we strive to establish successful lifelong learning through creating rich, engaging environments that encourage meaningful interactions between children, Educators and parents. We acknowledge that children who learn and participate in positive lifestyle choices including healthy eating and physical activity in childhood are more likely to continue these behaviours throughout life and we promote these in our daily practices.

Educators recognise that parents/guardians and families are the children's primary nurturers and most influential teachers in their lives and believe that mutually respectful and collaborative partnerships between them and the service are vital in caring for their child/ren. All families have the right to equitable access and participation in the community and we seek to provide opportunities to facilitate this and explore the potential in every day events, routines and activities at the centre.

Sherwood State School OSHC respects and encourages diversity, allowing all children and families to share and contribute their skills, strengths, expertise and culture to enrich our service. We value Australia's Aboriginal and Torres Strait Islander cultures as a core part of the nation's history, present and future.

Required Policies Matrix (Regulation 168)

In addition to policies outlined within the regulated policy matrix below, the Service has a range of other policies and procedures to support the effective and efficient operation and management of the OSHC service.

Policies and procedures are required in relation to the following—			
1		(i) nutrition, food and beverages, dietary requirements	1.6 Food and Nutrition 2.12 Safe Food Handling, Preparation and Storage (Food Safety Program)
2	(a) health and safety, including matters relating to—	(ii) sun protection	2.11 Sun Safety
3		(iii) water safety, including safety during any water-based activities	2.6 Water Safety
4		(iv) the administration of first aid	2.5 Administration of First Aid
5		(v) sleep and rest for children including the matters set out in regulation 84B	1.5 Sleep, Rest and Relaxation
6	(b) incident, injury, trauma and illness procedures complying with regulation 85		2.4 Incident, Injury, Trauma and Illness
7	(c) dealing with infectious diseases, including procedures complying with regulation 88		2.7 Infectious Diseases
8	(d) dealing with medical conditions in children, including the matters set out in regulation 90		2.9 Medical Conditions in Children
9	(e) emergency and evacuation, including the matters set out in regulation 97		2.13 Emergency Evacuation, Lockdown and Drills
10	(f) delivery of children to, and collection of children from, education and care service premises, including procedures complying with regulation 99		2.3 Safe Arrivals and Departures of Children
11	(g) excursions, including procedures complying with regulations 100 to 102		1.4 Excursions, Incursions and Regular Outings
12	(ga) if the service transports or arranges transportation of children other than as part of excursions, transportation including procedures complying with Division 7 of Part 4.2 of Chapter 4;		2.15 Transportation (Other than Excursions)
13	(gb) the safe arrival of children who travel between an education and care service and any other education or early childhood service within the meaning of regulation 102AA, including the matters set out in regulation 102AAB		2.3 Safe Arrivals and Departures of Children
14	(h) providing a child safe environment, including matters relating to -	(i) the promotion of a culture of child safety and wellbeing within the service	2.1 Providing a Child Safe Environment 2.14 Child Protection and Mandatory Reporting
15		(ii) the safe use of online environments at the service	2.16 Safe Use of Digital Technologies and Online Environments 5.5 Promoting Protective Behaviours
16		(i) a code of conduct for staff members	4.6 Code of Conduct
17	(i) staffing, including—	(ii) determining the responsible person present at the service	7.2 Determining the Responsible Person
18		(iii) the participation of volunteers and students on practicum placements	4.5 Volunteers and Students
19	(j) interactions with children, including the matters set out in regulations 155 and 156		5.1 Interactions and Relationships with Children

			5.2 Positive Behaviour Support Practices 5.4 Supporting Additional Needs with Inclusive Practices
20	(k) enrolment and orientation		6.2 Enrolment and Orientation
21	(l) governance and management of the service, including confidentiality of records		7.5 Government and Management 7.6 Privacy and Confidentiality of Records 7.7 Managing Notifications 7.11 Child Care Subsidy (CCS) and Additional Child Care Subsidy (ACCS) Management and Compliance 7.16 CCS Governance and Compliance
22	(m) the acceptance and refusal of authorisations		6.4 Acceptance and Refusal of Authorisations
23	(n) payment of fees and provision of a statement of fees charged by the education and care service		7.10 Fees, Statements and Parent Gap Fee Payments
24	(o) dealing with complaints	(i) the provision of a complaint handling system at the service that is child focused	6.7 Feedback and Complaints Handling
25		(ii) the management of a complaint that alleges a child is exhibiting harmful sexual behaviours.	2.14 Child Protection and Mandatory Reporting

Taking ‘Reasonable Steps’ to Ensure Policy is Followed

[Education and Care Services National Regulation 170](#) sets out the expectation of approved providers to take *reasonable steps* to ensure nominated supervisors, staff members and volunteers at the service follow the required policies and procedures.

To operationalise the expectations of *reasonable steps*, the Regulatory Authority have developed [a six step, outcome-based, framework](#) for approved providers to adopt in—

- the development policies; and
- the discharging of their governance responsibilities.

These steps should be reflected in both the service’s policies and management actions. Likewise, services should seek to capture and document evidence to demonstrate their compliance around this framework, should enquires into a services compliance need to be demonstrated. These are important aspects around the continued demonstration of *management capacity* (as aspect of being a [fit and proper person](#) for provider approval).

The six-step outcome-based framework contains—

Step	Theme	Requirements
1	Accessibility	Policies and procedures are readily available and are accessible to all staff as required.
2	Induction and ongoing training	Staff are provided adequate induction and ongoing training on the service’s policies and procedures to ensure up-to-date knowledge and skills.
3	Quality assurance and governance	Policies and procedures are regularly reviewed and maintained.
4	Monitor and audit compliance	Implementation of policies and procedures is regularly monitored to ensure staff are following them correctly.
5	Reformative action	Non-compliance with policies and procedures is promptly addressed.
6	Resourcing and support	Adequate resources and time are allocated to enable staff to practically comply with the service’s policies and procedures.

Scope of Roles and Responsibilities

To remove any doubt, these terms have the following meanings to roles within the service:

Approved Provider	The <i>Approved Provider</i> is the term used to refer to the Executive Committee of the P&C Association (i.e. the President, Treasurer, Secretary, and Vice President(s)). Collectively, these individuals hold the duties of management and control of the provider of the education and care service. The term has been chosen as it is consistent within the National Quality Framework, including the Education and Care Services National Law and Regulations. The Approved Provider is also the employer of all OSHC staff members. It is also the approved CCS Provider.
Nominated Supervisor	The Nominated Supervisor is the person(s) nominated by the Approved Provider to hold the role as described within the National Law and Regulations. The Nominated Supervisor will typically refer to the Nominated Supervisor position. Where the policy refers to the Nominated Supervisor, often in their absence the Responsible Person will assume these responsibilities, as so far it is relevant to day-to-day operations (refer policy 7.2 Determining the Responsible Person for further clarification).
Responsible Person	The Responsible Person is the employee nominated (with consent) to be placed in day-to-day charge of the service, in the absence of a Nominated Supervisor or the Approved Provider being on the premises. Their key role is to ensure the service operates consistently with the National Regulations. The role is referred to within the National Regulations as a 'person in day-to-day charge'.
Educational Leader	The appointed Educational Leader is responsible for the development and implementation of the service's program.
All Staff	The expectations, duties and responsibilities for all employees, volunteers or other relevant personnel are illustrated in the points connected to the all staff heading.
Families	The expectations and responsibilities for all families are illustrated in the points connected to the families heading.

Definitions

- **Assessment and Rating** – process through which education and care services are assessed by the Regulatory Authority for compliance with national legislation and for the quality of practice against the National Quality Standard
- **Authorised Nominee** - means a person who has been given permission by a parent/guardian to collect the child from the education and care service.
- **Australian Children's Education and Care Quality Authority (ACECQA)** – the national administrative body that oversees the implementation of the National Quality Framework throughout Australia
- **[Workplace] Bullying** - is repeated oppression, psychological or physical harm. It may be manifested in many ways e.g. harassment verbal, sexual or psychological), victimisation, alienation, coercion, intimidation, exclusion, ostracism or discrimination.
- **Discrimination** - is treating an individual with a particular attribute less favourably than an individual without that attribute or with a different attribute under similar circumstances. It can also be seeking to impose a condition or requirement on a person with an attribute who does not or cannot comply while people without that attribute do or can comply.
- **Disciplinary action** - action taken by the organisation to deal with any actual, alleged or perceived breach of legislation, policies, codes or other standards of work performance and/or conduct.
- **Duty of Care** – obligation under common law and the rules of negligence for education and care services to protect children, families, staff and all visitors to the service from harm. Approved Providers, Nominated Supervisors, educators and staff need to understand their responsibilities under duty of care
- **Education and Care Service** – means the OSHC service operated by the P&C.
- **Employee Counselling** - The discussion and analysis of issues which affect an employee's conduct and/or work performance. Counselling is used as a management action to improve an employee's performance where their behaviour or performance doesn't meet required expectations.
- **Emergency** - an incident, situation or event where there is an imminent or severe risk to the health, safety or wellbeing of a person at the education and care service (e.g. flood, fire, a situation requiring a lockdown)
- **Equal Employment Opportunity (EEO)** - is ensuring that all employees are given equal access to promotion, appointment or other employment related issues without regard to any factor not related to their competency and ability to perform their duties.
- **Excursion** – An approved activity organised by the service located outside of the premises (school site) – i.e. an outing. Children must be authorised to attend an excursion prior to leaving the premises.
- **Fit for Work** - an employee is fit for work if they: Have a blood alcohol level of 0.00 and test negative for drug use; and Are physically able to carry out their duties, as per their job description.
- **Infectious Disease** - communicable diseases that requires a person with the disease to be excluded from the service. The service has a duty to ensure adequate mitigation efforts are implemented to protect from the diseases being spread by individual attending the service.
- **Incident** - any event resulting in or having potential for injury, illness, damage or other loss.
- **Misconduct** - When an employee breaches their obligations under their contract of employment. Examples of misconduct may include but are not limited to: breaches of policies, codes of conduct and other reasonable instructions; unauthorised absence from work.
- **My Time, Our Place: Framework for School Age Care in Australia** – The Approved Learning Framework for school age care in Australia. It outlines the principles and practices that support and promote learning outcomes for children over preschool age
- **National Quality Framework (NQF)** – a mosaic composition of regulatory and quality mechanisms that come together to drive quality education and care for children, families and services around Australia.

- **National Quality Standard (NQS)** – sets a national benchmark for quality in education and care services, including OSHC. The NQS is comprised of 7 Quality Areas, 15 Standards, and 40 Elements. It is the basis for an Assessment and Rating.
- **On duty** - An employee is on duty at any time they are undertaking the duties and responsibilities associated with their contract of employment.
- **Parent** – a legal guardian of the child and a person who has parental responsibility for the child under a decision or order of a court.
- **Premises** – site the OSHC service operates from.
- **Program** - In the school age care setting ‘all the interactions, experiences, activities, routines and events, planned and unplanned, that occur in an environment designed to foster children’s wellbeing, development and learning.’
- **Quality Improvement Plan (QIP)** – must be developed by each service as part of a collaborative process of self-assessment of the quality of practice against the NQS and the national legislation
- **Regulatory Authority** – responsible for approvals, monitoring and quality assessment for education and care services in their state or territory. In Queensland, this authority is the Department of Education and Training - Early Childhood Education and Care
- **Serious Incident** – an incident or class of incident prescribed by the National Regulations. Serious Incidents are reportable and specific management and reporting actions are required by the service.
- **Serious Misconduct** – employee behaviour and action that are wilful or deliberate and are fundamentally inconsistent with the continuation of the employment relationship. It is conduct that causes serious and imminent risk to the health and safety of a person or to the reputation, viability or profitability of the employer’s business. Examples of serious misconduct include: theft, fraud, assault, intoxication at work and the refusal to carry out lawful and reasonable instructions
- **Standards** – sets the benchmark for quality practice and are aligned to the seven Quality Areas of the NQS
- **Trauma** - an event or incident that causes physical, emotional or psychological harm.
- **Underperformance** – where the employee’s performance is below the reasonable expectation set out by the employer.

Policy Group 1

Educational Program and Practice

The **educational program and practice** is the central element of operations that drives children's learning and development each day.

The program will be delivered to provide stimulation, engagement, and an opportunity to enhance children's wellbeing and growth. As we care for school-age children, our program nurtures the development of life skills and complements experiences, opportunities, and relationships at school, at home and in the community.

All policies are written to ensure that educators' pedagogical practices and strategies are child-centred and maximise possibilities for advancing and extending each child's learning and development. Our practices are developed to reflect the Service's philosophy, especially around the promotion of children's learning.

1.1 Educational Program Development and Implementation

Policy Statement

The Service recognises *My Time, Our Place* as the approved learning framework for school-age care under the National Quality Framework.

With the guidance and direction from our Educational Leader, we shape our planned and unplanned activities, our environment, and our practices to foster children's wellbeing, development and learning. As a program we expect the following outcomes for each child—

- the child will have a strong sense of identity
- the child will be connected with and contribute to their world
- the child will have a strong sense of wellbeing
- the child will be a confident and involved learner
- the child will be an effective communicator

We recognise the importance of a building a quality program as the foundation of the learning, development and support of a child's wellbeing. The Service is committed to ensuring the program encourages self-directed play, relationship building, collaborative decision making and respect for and celebration of diversity and inclusion, with a particular emphasis on cultural diversity and the cultural safety of all children.

The appointed Educational Leader, in collaboration with educators, children and families, will lead the development and implementation of the educational program and assessment and planning cycle. Which includes the systems used to communicate and share the children's learning with parents/guardians.

Roles and Responsibilities

Approved Provider	• Must ensure that a program is delivered to all children being educated and cared for by the service that— ○ is based on an approved learning framework, ○ is delivered in a manner that accords with the approved learning framework, ○ is based on the developmental needs, interests and experiences of each child; and ○ is designed to take into account the individual differences of each child including their cultural backgrounds and identities, to ensure cultural safety and belonging. • Supports educators in their professional development opportunities to ensure the provision of inclusive and anti-bias programs. • Assess service documents and communications to ensure that they are inclusive and promote an anti-bias approach, • Ensure all enrolment policies and practices are inclusive and free from bias
Nominated Supervisor	• Will provide support and guidance to the delivery and development of the program. • Ensure the development and implementation of the program is compliant with agreed procedures and legislative frameworks. • Support the pedagogy and development of educators to assist with program delivery. • Ensure relevant activity risk assessments are conducted to identify potential hazards, assess the risks and minimise any risks that could potentially cause harm or injury to children. This includes assessing and mitigating risks to children's cultural safety and wellbeing. • Ensure equitable access to the program and activities is provided to support children with additional needs, including those from diverse cultural backgrounds.

	• Ensure a risk assessment is conducted for any excursion, incursion or activities and areas deemed as high risk and is available for families to view upon request • Ensure families are notified about any excursions or incursion and if permission is required for participation, a permission form is provided for parent/guardian consent for their child to participate.
Educational Leader	• Provide coordination and leadership of the services program through a collaborative planning cycle. • Engage with the stakeholder group to gather ideas, wishes and feedback to inform program development, with a specific focus on incorporating diverse cultural perspectives and ensuring cultural safety for all children. • Utilise parent's expertise in relation to their child's needs and communicates effectively with parents. • Observe the local community of the service. • Show respect for the various ways that families care for their children and be aware of different child-rearing practices and beliefs. • Take a collaborative approach to documenting children's participation in the program as educators work with children to document their experiences and learning through a variety of methods.
All Staff	• Collaborate in critical reflection, observation, documentation, planning, and program implementation. • Facilitate programmed activities or experiences to support the outcomes of the program. • Actively participate in play opportunities, including the planning and design of these experiences. • Include children's voices in the development of the physical environment to provide opportunities for physical activity, risky play and creativity • Encourage children to be accepting and understanding of the different abilities of other children and to respect and appreciate diverse cultural backgrounds and traditions. • Encourage children to engage in physical activity and challenge themselves. • Promote equality regardless of gender, race, culture or differences. • Encourage children to develop to their full potential regardless of different abilities or needs. • Acknowledge and value children's unique and individual differences.

Procedures

Foundations of the Program

The Educational Leader is responsible, in consultation with educators, to continually recreate and adapt the indoor and outdoor environments to:

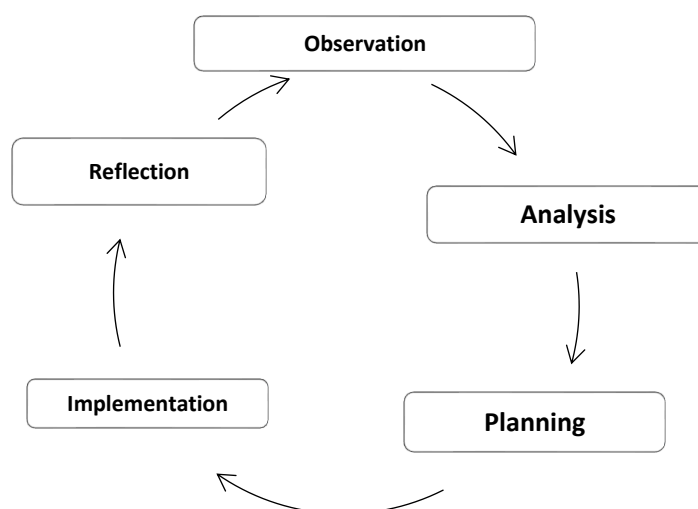
- Meet the needs and interests of all children, including their need for rest or sleep,
- Facilitate the inclusion of children with special needs and to ensure the cultural inclusion of all children.
- Respond to the developing abilities and interests of all children, while valuing and incorporating their cultural expressions.
- Ensure that all children in a multi-age group have positive experiences, that affirm their identity and cultural background.

The principle of equal opportunity will be applied in this Service's program. Children, regardless of gender, cultural, racial, religious or other background, will be encouraged to participate in a wide range of activities.

The development and delivery of the Service program will be:

- formed from an ongoing cycle of planning, implementing, documenting, and critically reflecting.
- based on the *Principles, Practices and Learning Outcomes of My Time, Our Place*.

- displayed in a prominent location, to be accessible for promotion and input of children and families.
- Reflective of the developmental needs, interests and individual expression of children who access the service, including their cultural heritage and linguistic diversity.
- where possible, the program will be designed to encourage children to complete projects and/or extend on ideas over a number of sessions.
- organised so activities, events and resources are chosen to maximise the facilitation of learning through play and leisure, contribute to the outcomes of the program, and to support children's social, emotional and spiritual wellbeing and development, with a particular focus on fostering cultural safety and a strong sense of belonging for every child.
- is flexible in delivery incorporating children's current knowledge strengths, ideas, culture, abilities and interests throughout design and implementation.
- built around routines, i.e., arrival, hand washing, eating etc. and include a variety of activities and experiences that promote effective hygiene practices, good nutrition, and healthy lifestyles.
- Inclusive of activities which would normally be a part of the life of children during hours outside of school (this is particularly relevant during Vacation Care where excursions become an important part of the program)
- Designed and facilitated to ensure children are able to move freely between relevant play spaces, both inside and outside.
- Considered for risk and hazards so children have intentionally designed and managed opportunities for play aimed to develop children's risk awareness.
- Respectful of the diversity of families within the community and allowing opportunities for children to broaden their understanding of the world in which they live through the investigation of histories, cultures, languages and traditions, including those of Aboriginal and Torres strait Islander peoples.



Planning Cycle

The Service **Educational Leader** is responsible for coordinating the design and implementation of the service's weekly program and ongoing development of educator practices. Their role is central to the service's planning cycle and delivery of the service's program.

The Educational Leader, with additional support from the service's leaders, will engage educators to collaborate in the planning and implementation of the program. Tasks used to support the development of the program and learning cycle include, but are not limited to:

Observation	• Educators record observations of the children's experiences, learning and participation. This information is recorded in a manner that demonstrates a deeper understanding of the journey of learning and outcomes. • The Educational Leader facilitates regular group discussions among staff extend individual observations and record a deeper discussion and collective understanding.

	• Documentation reflects a holistic view of children's learning, including their cultural perspectives and expressions. • Encourages and provides appropriate opportunities for families to participate in shared decision making and give feedback about the program and their child's learning, ensuring cultural responsiveness in communication and engagement. • Documents the developing and emerging abilities and interests of all children, acknowledging the influence of their cultural backgrounds.
Analysis	• Applying an understanding of research, literature and theory, with a particular focus on child development, and play-based learning to enhance the planning and practice of the program. • Question and evaluate what has already been learned or expressed to understand further possibilities. • Demonstrating a positive approach towards diversity and Australia's Aboriginal and Torres Strait Islander heritage being integrated into the program and actively promoting cultural understanding and reconciliation. • Activities, experiences, environment and resources are a representation of the intentionality of educators and the service to provide diverse, developmentally focused and individually considered learning opportunities that are culturally sensitive and inclusive. • Opportunities to critically reflect are enhanced through individual and collective opportunities to understand children's learning and development, including their cultural learning.
Planning	• Program plans are displayed for children and families to understand and to meaningfully contribute to. • Program plans are developed in collaboration with educators, children and families. The Educational Leader is responsible for coordinating these ideas and intentions. • The program should support, allow and encourage children to complete long-term projects and build upon experiences • Program planning considers opportunities for children to engage in sustainable practices and routines, including (but not limited to): ○ Using recycled items in craft activities and scrap paper for drawing; and ○ Recycling food scraps, establishing a garden, compost or worm farm. • Planning demonstrates flexibility for program delivery by incorporating where children's ideas, culture and interests have been included. • The service identifies a variety of indoor and outdoor experiences, open-ended resources, natural elements and materials suited to the age, developmental ranges and diversity of all children attending the service with careful consideration for cultural appropriateness and representation. • Activities and experiences that present high-risk will be risk-assessed and suitably managed to uphold the safety of children and staff.
Implementation	• Provides appropriate opportunities for children as individuals and small groups to follow and extend their interests as they choose. • Supporting a balance of indoor, outdoor, planned and spontaneous physical activities and passive experiences for children by encouraging participation in new and/or unfamiliar activities and accepting the children's level of involvement according to their skill and ability. • Educators provide opportunity for children to be involved in a variety of types of play including socio-dramatic, creative, exploratory, imaginative, physical and rough and tumble. • Appropriate opportunities for children to express themselves through creative and imaginative play, including elements of music, dance, drama etc. are enhanced through educator practices. • Educators positively guide and support appropriate opportunities for children to develop a range of life skills such as establishing and maintaining meaningful relationships, working collaboratively with others and self-regulating their own behaviour. • Children are actively encouraged to participate in a combination of moderate and vigorous physical activities every day, as part of play and games.

	• The safety of activities will be supported through appropriate risk-assessment planning. Educators will be responsible for following control measures as identified and responding to any hazards that present. • The Educational Leader is responsible, in consultation with educators, to continually recreate and adapt the indoor and outdoor environments to: • Meet the needs and interests of all children, including their need for rest or sleep, • Facilitate the inclusion of children with additional needs; and • Ensure that all children in a multi-age group have positive experiences.
Reflection	• Provide appropriate opportunities for children to broaden their understanding of the world in which they live by reflecting the broad multicultural and multilingual nature of the community and actively promoting intercultural understanding and appreciation. • Consider holistic approaches support multiple aspects of a child's wellbeing and development – including physical, cognitive, social, emotional, cultural and spiritual learning or expression.

Leading the Planning Cycle

Every week the Educational Leader will collate, review and consider the written evaluations (documentation) of educators, and evaluate the planned and spontaneous experiences to ensure the identified goals and learning outcomes were achieved. These evaluations will inform future programming decisions in collaboration with all educators, children and families in the creation of future planned activities and experiences for children. This evaluation will be made available to families (refer policy [1.3 Sharing the Program and Children's Progress with Families](#)).

Through regular planning meetings, the Educational Leader, educators and other staff will draw on the diverse knowledge, views and experiences of each other when reviewing the experiences planned for children to ensure that all children have opportunity to achieve the learning outcomes and that their cultural safety and wellbeing are consistently prioritised.

The Nominated Supervisor will, on a regular basis at team meetings:

- Seek verbal comments from educators in respect to the effectiveness of the programs delivered by the Service to ensure that the service philosophy and goals is guiding the program and are achieved.
- Discuss with educators the ways in which the program could be modified or enhanced because of any feedback or experience encountered in the delivery of the program. Written minutes will be taken at these meetings.

The Nominated Supervisor, Educational Leader and educators will meet to at least each term to review the service's achievements and practices, evaluating the quality of the program and service delivery. These evaluations will guide the Quality Improvement Planning for Quality Area 1 and develop actions to enhance the program for children and families, with a strong emphasis on continuous improvement in cultural safety and inclusion.

Taking into account all feedback received through these procedures (and those identified in policy [1.3 Sharing the Program and Children's Progress with Families](#)), the Nominated Supervisor and Educational Leader will develop a quarterly report (each term) to the Approved Provider on the evaluation of the effectiveness of the service programs and areas of continued development including an assessment of cultural and safety practices.

Providing a Variety of Activities and Experiences

The Service aims to provide all children with a variety of activities and experiences (as set out below), focusing on fun, enjoyment, participation, mastery and success while ensuring these experiences are culturally enriching and respectful.

Educators will encourage and provide appropriate support to children to participate in new or unfamiliar experiences and act as good role models by becoming involved in and enjoying children's activities.

Physical activity

When planning physical activity games and experiences, individual children's needs, interests, ages and capabilities will be taken into consideration. Educators will encourage children to help plan and set up physical play activities and equipment and to play safely while negotiating indoor and/or outdoor play spaces to ensure the safety and wellbeing of themselves and others and to respect personal space and cultural norms related to physical interactions.

Educators will set up the indoor/outdoor area in such a way as to:

- Promote development of children's gross and fine motor skills.
- Promote safe physical play for children of different age groups and capabilities.
- Stimulate children's interest and curiosity by being creative in their use of equipment and materials.
- Offer a range of challenges and experiences, inviting children to explore, discover and experiment.
- Facilitate the inclusion of children with special/additional needs.
- Support children to create their own games and experiences.
- Promote children's independence.
- Support children to take considered risk in their decision making and manage unexpected outcomes.

The Service will vary activity sessions to provide opportunities for children to participate in a variety of activities that are fun, suit their interests, skills and abilities and help to build their confidence while acknowledging and incorporating diverse cultural forms of movement and play. Educators may incorporate water-based play activities into the outdoor environment ensuring risk assessments have been conducted prior to implementation.

The program offered will contribute to the recommended daily physical activity in accordance with the 24-hour movement guidelines – children (5 to 17 years). Programming will be developed to reflect the Service's commitment to these guidelines.

Physical activity and sedentary behaviour information and guidelines for parents are available at the Parent sign in area. Appropriate physical activity manuals and other resources are available at the service.

Creative and expressive arts

Educators will encourage children to actively participate in a variety of creative and expressive experiences including art and craft, singing, dancing and imaginative play. Open ended resources and materials such as musical instruments, dress-ups, cd's and/or a stereo will be available for children to enable them to extend and express themselves creatively, ensuring a diverse range of culturally representative materials and experiences are available.

When implementing creative and expressive arts experiences, educators will set the area up in such a way as to:

- Promote safety for children of different age groups and capabilities.
- Stimulate children's interest and curiosity by being creative in their use of equipment and materials.
- Offer a range of challenges and experiences, inviting children to explore, discover and experiment.
- Facilitate the inclusion of children with special/additional needs and ensure cultural representation and appreciation in artistic expressions.
- Support children to create their own experiences.
- Provide open ended resources to encourage children's efforts to extend and express themselves.

Sufficient time and space will be allowed for children to engage in sustained or extended activities based on the interest and capabilities of the children.

Risky Play Activities

The Service recognises that there are play scenarios and situations in which it is both natural and compelling for children to engage with each other in high-risk play such as play fighting, and/or gun play.

The Service will facilitate such imaginary risky play with the understanding that engaging in this type of play does not necessarily result in children becoming violent. However, Educators will monitor such play carefully and re-direct to more appropriate play if necessary and look for opportunities to engage children in meaningful discussions around play, including the difference between pretend play and real life, and the consequences of such actions, always considering the potential cultural interpretations and impacts of such play.

The Nominated Supervisor will ensure a comprehensive risk assessment is conducted prior to any high-risk activities being undertaken. All educators involved in such activities will read and sign the risk assessments and be briefed on their responsibilities prior to the activity.

Sustainability practices

The Nominated Supervisor and educators will be encouraged to follow sound environmental practices, working collaboratively with the children and their community to develop and implement sustainable practices related to the Service program and routines, including (but not limited to):

- Recycling food scraps.
- Using recycled items in craft activities.
- Recycling scrap paper for use.
- Establishing a garden and using the produce in the Service menu.
- Establishing composting or worm farms for scraps.
- Creating play spaces for children to interact with the natural environment; and
- Undertaking regular reviews of sustainable practices within the Service.

Educators will encourage children to be aware of energy efficiency, particularly in relation to the use of lighting, heating and air conditioners. Information relating to sustainable practices will be accessed and readily available for educators, children and families at the Service and will include Indigenous perspectives on land care and sustainability where appropriate.

Incursions

Incursions enhance children's learning by providing them the opportunity to participate in curriculum planned activities and experiences to extend on their skills and knowledge in the current interest topic.

Incursions will be regularly planned during vacation care and conducted in a safe manner, maintaining children's health, safety and wellbeing at all times. The Service recognises that incursions provide opportunities for children to expand and enhance their skills and knowledge and connect with the local and wider community as a group, extending on the educational program provided, actively seeking incursions that promote cultural understanding and celebrate diversity.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.168 Offence relating to required programs
- **Education and Care Services National Regulations:**
 - R.73 Educational program
 - R.74 Documenting of child assessments or evaluations for delivery of educational program
 - R.75 Information about educational program to be kept available
 - R.76 Information about educational program to be given to parents
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.298A Programs for children over preschool age
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety
 - QA3 – Physical environment

- QA4 – Staffing arrangements
- QA5 – Relationships with children
- QA6 – Collaborative partnerships with families and communities
- QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Approved learning Framework – My Time Our Place V2 2022](#)
- [NQF Child Safe Culture Guide Final 1.pdf](#)
- Queensland Government [Statement of Shared Commitment](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [1.2 Documenting Children's learning](#)
- [1.3 Sharing the Program and Children's Progress with Families](#)
- [1.4 Excursions, Incursions and Regular Outings](#)
- [1.5 Sleep, Rest and Relaxation](#)
- [1.6 Food and Nutrition](#)
- [1.7 Screen-Time and Media Viewing](#)
- [1.8 Use of Artificial Intelligence \(AI\) Technology](#)
- [2.1 Providing a Child Safe Environment](#)
- [2.2 Supervision and Educator Ratios](#)
- [3.1 Space and Facilities Requirements](#)
- [5.1 Interactions and Relationships with Children](#)
- [5.4 Supporting Additional Needs with Inclusive Practices](#)
- [6.6 Community Communication and Participation](#)
- [6.11 Cultural Safety](#)
- [7.3 Educational Leader](#)

Policy 1.1 Educational Program Development and Implementation		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 - Updated format and enhanced procedures		
V2-06.2024 – Additional information relevant to providing a variety of activities		
V3-03.2025 – Added additional information to roles and responsibilities, references to physical activity guidelines and procedures relevant to risky play and incursions		
V4-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V4-04.2026 – No updates		

1.2 Documenting Children's Learning

Policy Statement

The Service recognises its responsibility to ensure the safe and ethical use of digital technologies, including the taking and storage of children's images. We acknowledge the need to document children's participation in the program to inform future program development and to ensure the needs, interests and abilities of all children are broadly considered. We understand that children's participation and experiences may be documented in a variety of different ways, depending on the context of the observation and learning. The Service is committed to upholding the highest standards of ethical decision making and privacy when observing, documenting and managing information and images of children, always prioritising their safety and wellbeing.

Definitions:

Educational Programme: A comprehensive plan detailing learning objectives, experiences, and activities aimed at fostering children's development and educational growth.

Documentation – the range of methods used by educators to gather information about children, identify and analyse learning, plan, and evaluate the program.

Assessment – the gathering of information about children's wellbeing, learning and development using a range of strategies. (p. 26, MTOP V2.0, 2022)

Reflection: In early education and care, reflection refers to the process of thinking about and evaluating one's own practice and experiences. It is generally a retrospective examination of events, activities, or interactions to understand what happened and how it was handled.

Critical Reflection: A step further than the process of reflection that involves deeply analysing and questioning the underlying assumptions, theories, and practices that inform one's work. It involves examining practices from multiple perspectives, including philosophical, theoretical, ethical, and social viewpoints.

Informed consent - A legally sound and clear process where families are given all necessary information about how and why their child's images or videos will be taken, used, and stored. This includes details on the specific purposes, a clear understanding of potential risks, and the explicit right to withdraw consent at any time. The consent must be freely given and documented in writing.

Roles and Responsibilities

Approved Provider	• Ensure there is documentation gathered relevant to the educational program, adhering to all digital safety and privacy guidelines. • Establish and enforce procedures to ensure all records related to a child enrolled in the service, including digital images and videos, are kept securely on the child's file for a minimum of 3 years in accordance with the Education and Care Services National Regulations and are available for the perusal of the family on request. • Implement clear, explicit, and legally compliant processes to ensure families provide informed written and revocable permission/consent for photographs or video recordings of their child by the Service. This consent will explicitly outline the specific purposes, storage, and potential sharing of images and will be based on the principle of the child's best interests and right to privacy. • Mandate that all photographs, video, or other recordings of children are stored in highly secure, password-protected systems, accessible only by authorised personnel, and are promptly and permanently deleted or disposed of in a secure manner when the child is no longer enrolled at the Service, in line with privacy obligations.

Nominated Supervisor	• Provide support and guidance for the gathering of documentation relevant to the educational program, with a consistent emphasis on safe and ethical digital practices. • Oversee implementation of the program planning cycle to ensure compliance with regulatory requirements, including all aspects related to digital safety and image management. • On request, provide families with documentation of their child's participation as well as assessments of their child's wellbeing, development, and learning within the program, ensuring privacy and confidentiality are strictly maintained, especially with digital content. • Ensure every child in our care is protected from any unauthorised access, misuse or exploitation of photographic and video images taken whilst they attend the Service, implementing all necessary safeguards. • Mandate that photographs and videos recorded at the Service as part of a normal day are taken using service-issued, secure digital cameras or service owned electronic devices. These images may only be taken by members of the staff team, or by practicum students with written parent/guardian permission and under direct supervision, strictly prohibiting the use of personal devices for image capture. • Develop and widely share a clear and accessible record of all children who are NOT to be photographed or videoed ensuring this vital information is communicated to and understood by all educators and staff immediately upon enrolment and regularly reinforced. This record will also document if a child, regardless of parental consent, has expressed a wish not to be photographed or filmed, and this wish will be respected.
Educational Leader	• Lead and implement the assessment and planning cycle across the Service integrating best practices for safe digital documentation. • Become familiar with the reflective process and regularly reflect on the program to ensure that the intended outcomes for children are being met, including safe digital engagement. • Support Educators with their knowledge and capacity to complete programming documentation and recording children's learning, providing training on secure digital practices. • Ensure Educators understand and use the My Time Our Place Learning Framework to document and assess children's learning, emphasising ethical image use. • Guide and mentor Educators to refer to the Planning and Assessment Cycle when documenting and evaluating activities and experiences, considering the implications of digital content. • Review documentation about children's learning when planning future programs to ensure children's interests are captured while upholding privacy and safety standards for all captured images. • Ensure photographs taken by educators genuinely support the children's learning and accurately record children's individual progress, always adhering to consent and privacy guidelines. This includes avoiding images that are gratuitous or solely for promotional purposes without explicit, informed consent and actively seeking children's input on how their images are used.
Educators	• Record children's learning through completing programming documentation adhering to all digital safety and privacy protocols. • Use the My Time Our Place Learning Framework to document and assess children's learning, with careful consideration for digital content and images. • Refer to the Planning and Assessment Cycle when documenting and evaluating activities and experiences, always mindful of the responsible use of technology and images.
Families	• Provide clear, written notification to the Nominated Supervisor if they do NOT want their child to be photographed or videoed, or their image

	published in any form, ensuring their preferences are respected and actionable. • Support their child in expressing their wishes regarding their image, in line with their growing capacity and rights.

Procedures

As part of the Service's ongoing planning, reflection and evaluation processes, educators will be required to document various aspects of children's learning and experiences within the program to assist with ongoing reflection, evaluation and assessment of their strengths, interests, behaviours and relationships and to ensure the Service identified goals are met. This documentation will always be collected and managed in a manner that prioritises child safety, privacy, and wellbeing, particularly concerning digital technologies and images.

The Service supports Educators to document information about children's participation in the program. Documenting children's experiences and noting information that happens during their time at the Service helps develop effective programs that reflect children's interests and development. It's also a method of sharing information with families about their child's learning, recreation and experiences.

Educators shall receive comprehensive, ongoing training and support to develop their skills with documenting children's learning and participation, including best practices for digital safety, image handling, and privacy compliance. This training will also include methods for engaging children in conversations about their rights to privacy and consent.

Intentionally planned experiences are developed from observations and outcomes of children as an individual or as part of a group and developed into a program that is displayed for parents/guardians to read and have input. The program will have a mixture of intentional and emergent experiences documented on the curriculum plan with planned experiences from previous learning stories and documentation included and linked on this document.

Educators are encouraged to work alongside children and be co-constructors of learning to:

- Help with research,
- Document and advocate,
- Encourage children to wonder and question,
- Determine children's learning styles, and consider how they adapt intentional teaching to nurture each child's uniqueness
- Encourage more decision making, increasing children's awareness and understanding of themselves
- Help them feel important and respected, to feel that they belong to the community.
- Teach children about digital safety, online etiquette, and responsible use of devices, even if they are only documenting their own play.

Documentation will incorporate children's voices and provide genuine opportunities for children to make decisions and choices, including opportunities to review and provide input on how their own images or recordings are used, where appropriate and safe. This includes the right for a child to say "no" to being photographed or filmed, and for that decision to be respected and upheld by all staff.

The Service may from time to time require educators to document long records of observations, particularly in respect to behaviour incidents or issues relating to child protection matters. These sensitive records will be handled with the utmost confidentiality and security. These records and observations, if appropriate, may be made available to parents/guardians upon request but shall under no circumstances breach the confidentiality or privacy of another child or family nor compromise any child protection investigations in the sharing of such information, refer policy [7.6 Privacy and Confidentiality of Records](#).

Methods of Observing and Documenting Children's Experiences and progress

Children feel valued and learn from experiences when they are involved in this process therefore The Service takes a collaborative approach to the documenting of children's learning and participation in the program as educators work with them to document their activities and experiences. Photographs and/or

videos are taken primarily to support the individual learning of each child for their formal record and to securely record children's work and activities within the Service environment, always adhering to consent permissions and digital safety protocols.

There are many methods of observing and documenting children's experiences, interactions, development, discoveries, ideas, and questions including the following:

- Photographs:
 - Capturing photographic observations that meaningfully support written documentation of learning, not just casual snapshots.
 - Using photographs as a tool for children to recall and talk about their experiences, and as a safe, visual way of sharing their experiences with families.
- Learning stories and/or programming notes:
 - Writing down
 - a story they've told you / acted out or videoed,
 - what you've observed children learning,
 - interactions with their peers,
 - the story of their artwork or creations possibly supported by photographic evidence or the actual artwork,
 - experiences when on outings and excursions and supporting this with photographic evidence, brochures etc.
- Voice/video recordings, involving children in recording each other like a reporter, with explicit consent from all children involved.
- Posters of play and learning children are engaged in.
- Evaluation forms.

Educators may be required to complete observations/documentation regarding specific children's needs, particularly in relation to children with identified additional needs and/or medical concerns. This may include recording information and reflections that are strictly confidential in a separate diary or utilising a two-way communication book, ensuring sensitive information is always protected digitally and physically.

Photographs taken by Educators support children's learning and record children's individual progress and growth, always aligning with the purpose of documentation and individual consents. All photographs or videos of children are taken exclusively with a service issued iPad or other service-approved, secure digital device, strictly adhering to the National Model Code for Taking Images or Videos of Children.

Photographs and videos are part of a normal day at the Service, and children are encouraged to request our child-friendly iPads to document their time within our environments, under direct educator supervision and with clear guidelines on appropriate content. These photographs may be included in our monthly newsletter, service displays or posts/announcements in our childcare software and only if prior, informed parental/guardian consent has been given for such publication. Children's surnames and other identifying information such as specific locations or ages will not be included in any publicly displayed or shared images unless explicit, separate and informed parental/guardian consent is received for each specific purpose. This practice is to ensure the highest level of privacy and protection for every child.

If a parent/guardian does not consent to a child's identity being identifiable in photos or videos in any form, this must be clearly communicated in the enrolment form or via email and this instruction will be rigorously followed across all platforms and displays.

Programming documentation and Information will be kept in a highly confidential and secure manner in line with policy [7.6 Privacy and Confidentiality of Records](#) and completed on the Service templates for documentation or other methods approved by the Nominated Supervisor that meet strict security protocols.

Ethical Standards for Documenting Observations

The Service is dedicated to upholding ethical standards when documenting observations of children's play and learning. Our approach aligns with the child safe practices, with a particular focus on child safety and wellbeing and cultural safety. Educators are expected to be mindful of the following principles when gathering and documenting information:

- Honesty – Educators must demonstrate honesty in all documentation. This means accurately and truthfully recording observations without fabricating, falsifying, or misrepresenting information. Our

commitment is to ensure the integrity of our records for the safety and wellbeing of every child and their family.

- **Objectivity** – strive for objectivity by ensuring that documentation is free from personal bias. Educators are trained to collect, organize, and analyse information impartially, focusing on the child's actions and words rather than personal interpretations or assumptions. This practice ensures that our observations contribute to a holistic understanding of the child's development, respecting their unique identity and cultural background.
- **Non-discrimination** – documentation practices are grounded in non-discrimination. Educators must actively avoid any form of bias against children, families, or colleagues based on factors unrelated to a child's competence or needs. This includes respecting all cultural backgrounds and ensuring that observations are inclusive and culturally safe for everyone.
- **Carefulness** – Educators are expected to exercise carefulness in their work. This involves meticulous attention to detail to prevent careless errors and negligence. Maintaining accurate and detailed records of activities and correspondence is a key component of our commitment to the safety and wellbeing of the children in our care.
- **Confidentiality** – Confidentiality is paramount. Educators are obligated to protect sensitive information, including personal and family records. Educators must adhere to strict protocols to ensure that all confidential data is handled securely, maintaining the trust of families and safeguarding the privacy of every child. This is a critical element of our duty of care and commitment to child safety.

Assessing Children's Learning

Learning Stories and programs are evaluated based on the learning outcomes to reflect on what happens each week and how educators can further support children's learning, recreation and experiences. When assessing the learning outcomes of experiences and activities, Educators will consider and document the learning outcomes as per My Time, Our Place - Framework for School Age Care.

Once Educators have identified the outcomes of activities and experiences they are required to consider and document how this information links and assists in further intentional teachings and learning experiences for the program, always ensuring that children's privacy and wellbeing are paramount in the assessment and planning process.

Making Learning Visible

The Service will have a display in the sign in area to let families know what play experiences were of interest and what opportunities will be offered in the coming days or week. Photos and children's artwork are useful and meaningful ways of sharing this type of information, provided all consents for image display are met, and children's privacy is respected.

A variety of documentation around the service captures observations about children and their current and emerging skills and knowledge, including:

- artwork the children have produced,
- photos of children engaged in play and learning experiences, displayed only with appropriate consent and ensuring no child is identifiable if consent for their image is withheld.

Reflective and Critically Reflective Practices

Educators will be required to critically reflect on and evaluate activities, both planned and spontaneous, by using various methods to ensure experiences provided meet the identified learning outcomes for the children involved. Critical reflection involves closely examining all aspects of events and experiences from different perspectives, including the safety, privacy, and ethical implications of digital technologies and image use.

Reflective practice strengthens awareness, challenges ideas, and supports growth and development while providing quality learning experiences for children. This approach influences the planning and direction for future experiences and assists in developing and making meaningful curriculum decisions, always incorporating a lens of digital safety and responsible image management and the ethical dilemmas inherent in documenting children's lives.

Reflective processes can be done individually, with other Educators, the Educational Leader and/or the Nominated Supervisor. For reflective practices to successfully occur, the following is required:

- *Trust and collegiality* - Educators, the Educational Leader and/or Nominated Supervisor builds strong and trusting relationships that provide an open and honest space for an in-depth conversation about practice, including challenges and best practices in digital safety and privacy.
- *Opportunities for all to contribute* –families, children, and other stakeholders contribute to their reflection, providing valuable perspectives on digital safety and image use from their lived experiences.
- *Organisational commitment to inquiry* - professional conversations and ongoing professional development, particularly focusing on emerging trends and risks in digital technologies and child safety.
- *Time for reflection and to develop skills* - make reflection a priority, share with others and seek feedback to develop new thinking and challenge your world view, especially regarding ethical dilemmas in digital documentation.
- *Recognition, that there is no one right approach or answer* - being open to different approaches and considering how these could be used in everyday practice, while never compromising child safety or privacy in digital contexts.
- *Courage to question taken-for-granted practices and assumptions* - look for other ways of working and thinking about practice, particularly challenging any complacent attitudes towards digital security or image management.

Reflective Practice Strategies, Tools and Resources

To engage in critical reflection requires you to have an inquiring mind about your practice, to seek to understand why you respond in particular ways and question your own behaviour and impact or influence on families and children's experiences. At the Service there are a range of strategies, tools, and resources that support Educators to engage in both individual and group reflections, specifically tailored to address digital safety and image management, including:

- *Keeping a journal or notebook* which supports documenting the reflective practice process. Journal notes might include what happened, why, who was involved, key points from discussions, actions that were taken and the outcomes with specific entries dedicated to digital safety incidents or dilemmas.
- *Setting aside time* for reflecting on one aspect of practice and planning actions to develop a culture of inquiry, such as a regular reviews of digital safety protocols.
- *Reflecting with children* every day by using questions that respect their ideas and learning: "What did you learn today?" "What do you want to learn more about?" "How do you know that?" "What makes you think that?" This can also extend to discussions about online safety and respectful digital interactions.
- *Accessing professional resources* through professional associations and or online sources, prioritising those focused on child online safety, digital ethics, and data privacy.

The Service will support the Educational Leaders capacity to lead or support reflective practice by providing professional learning opportunities focused on reflective practice and through coaching or mentoring by a more experienced leader or external consultant with a particular emphasis on fostering expertise in digital safeguarding and responsible technology use within the service.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.168 Offence relating to required programs
- **Education and Care Services National Regulations:**
 - R.73 Educational program
 - R.74 Documenting of child assessments or evaluations for delivery of educational program
 - R.75 Information about educational program to be kept available

- R.76 Information about educational program to be given to parents
- R.118 Educational Leader
- R.168 Education and care service must have policies and procedures
- R.170 Policies and procedures to be followed
- R.171 Policies and procedures to be kept available
- R.177 Prescribed Enrolment and other documents to be kept by Approved Provider
- R.183 Storage of records and other documents
- R.298A Programs for children over preschool age
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety
 - QA3 – Physical environment
 - QA4 – Staffing arrangements
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- Approved Learning Frameworks
 - [Belonging, Being and Becoming – The Early Years Learning Framework for Australia V2.0, 2022](#)
 - [My Time Our Place - Framework for School Age Care in Australia V2.0, 2022](#)
- [Unpacking the planning cycle: Part 3 | ACECQA](#)
- Development Milestones EYLF [developmental-milestones.pdf \(dss.gov.au\)](#)
- [Federal Register of Legislation - Privacy Act 1988](#)
- [National Model Code Taking Images and Videos.pdf](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [1.1 Educational Program Development and Implementation](#)
- [1.3 Sharing the Program and Children's Progress with Families](#)
- [1.4 Excursions, Incursions and Regular Outings](#)
- [1.8 Use of Artificial Intelligence \(AI\) Technology](#)
- [2.18 Safe Use of Digital Technology and Online Environments](#)
- [5.1 Interactions and Relationships with Children](#)
- [5.4 Supporting Additional Needs with Inclusive Practices](#)
- [7.3 Educational Leader](#)

Forms and Resources

- [Digital Technology/Online Environment Authorisation Form](#)
- [Service Owned Digital Device Register](#)
- [Parent/Guardian Consent for Taking, use and storage of images and videos](#)

Policy 1.2 Documenting Children's Learning		
Version and reason for change	Date Implemented	Date of Review
V1-06.2024 – new policy		
V1-03.2025 – No updates		
V2-10.2025 – Enhanced policy statement, additional definitions, enhanced roles and responsibilities, enhanced procedures, added procedures relevant to ethical standards for documenting observations, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

1.3 Sharing the Program and Children's Progress with Families

Policy Statement

Adjacent to the development and implementation of the Service program is the collaboration and communication with parents/guardians, children and families. Engagement and participation from the Service stakeholders to guide the evaluation of the program is a critical element in both quality improvement and compliance of the National Quality Standards.

The Service documentation, critical reflection and planning will be created and maintained in a manner that is accessible to and displayed for families to understand the learning that the Service is creating for their child/ren. The Service is committed to providing meaningful opportunities to collaborate with families to extend on the learning activities and experiences for children accessing the service, ensuring these opportunities are culturally responsive and affirm each child's identity and heritage.

The records and observations, if appropriate, may be made available to parents/guardians upon request but under no circumstances breach the confidentiality or privacy of another child or family in the sharing of such information.

Roles and Responsibilities

Approved Provider	• Ensure the program is made available to families. • Support the service in sharing the learning and progress of children with the parents/guardians and families of the service in a way that respects and incorporates their cultural backgrounds and communication preferences.
Nominated Supervisor	• Monitor and support the implementation of the service program and the planning cycle with a focus on upholding children's cultural safety and wellbeing. • Lead the communication and collaboration with parents/guardians and families, ensuring culturally sensitive and inclusive engagement practices. • Ensure the quality and consistency of communication is meeting the service's aims, including its commitment to cultural responsiveness.
Educational Leader	• Drive the evaluation and communication processes for information sharing with families, prioritising cultural relevance and inclusivity. • Support educators to participate in critical reflection and partnerships with families with an emphasis on developing cultural competence and fostering culturally safe environments.

Procedures

Collaboration and Communication with Children

Educators will regularly seek feedback and perspectives from children. These ideas, evaluations and wishes will be recorded in the program's documentation with particular attention to understanding children's cultural perspectives and how these shape their experiences and learning. Documentation completed by educators will facilitate opportunities for critical reflection and prompt opportunities for the Educational Leader to collaborate in coordinating activities and experiences that build upon these learning extensions while always considering the cultural context of children's input.

Additionally, children's comments, suggestions and feedback are collected through conversation and observations. Children are encouraged to express their thoughts and comments using diverse methods to ensure all children, including those from diverse linguistic and cultural backgrounds, can contribute comfortably.

Educators complete a weekly evaluation, which captures the conversations and observation of children's experiences. These are collated by the Educational Leader and documented on how they were added to the program's planning and implementation.

Communicating Children's Learning and Development

The Educational Leader will prepare a weekly evaluation of the service's program, these include both the planned and spontaneous activities that children have engaged in. This evaluation will be made available to families via email and a display in the sign in area. The communication to families contains a variety of evaluations including critical reflection of children's learning, their progress and experiences and will highlight how the program supports each child's cultural safety and fosters their cultural identity.

The Service acknowledges the privacy of families and encourages the appropriate use of photographic and video images of children attending the service to support and promote their involvement in relevant programs and activities. Parent permission is obtained prior to any photographs/videos of children being taken or displayed.

Information Sharing and Partnerships with Families

Educators will regularly seek feedback and information from families in relation to their child/ren and their participation in the programs delivered by the Service, actively inviting and valuing cultural insights and preferences to enrich the program.

Families are invited at parent/guardian information sessions and through the Family Handbook to contact the Nominated Supervisor/Educational Leader at any time with any comments, complaints or suggestions relating to the programs provided by the Service, particularly concerning children's wellbeing, cultural safety or inclusion.

Families can also contribute their thoughts, perspectives and wishes to inform the program through:

- Conversations with educators, ensuring these are conducted with cultural sensitivity and respect for diverse communication styles.
- Email correspondence and feedback
- Surveys and feedback prompts designed to be accessible and culturally appropriate for all families.
- Newsletters which will include diverse cultural content and information on cultural safety initiatives.

In seeking feedback from parents/guardians or educators, the Nominated Supervisor will treat all complaints relating to the Service program respectfully and in accordance with policy [6.7 Feedback and Complaints Handling](#) and, where necessary, will take appropriate steps to seek to address genuine complaints quickly and effectively with a particular commitment to resolving any concerns related to cultural safety or discrimination.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.168 Offence relating to required programs
- **Education and Care Services National Regulations:**
 - R.73 Educational program
 - R.74 Documenting of child assessments or evaluations for delivery of educational program
 - R.75 Information about educational program to be kept available
 - R.76 Information about educational program to be given to parents
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.298A Programs for children over preschool age

- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA4 – Staffing arrangements
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities

Additional Regulatory Context and Guidance

- [My Time Our Place - Framework for School Age Care in Australia V2.0, 2022](#)
- [Privacy Act 1988](#)
- [NQF Child Safe Culture Guide Final 1.pdf](#)
- Queensland Government [Statement of Shared Commitment](#)
- [National Model Code Taking Images and Videos.pdf](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[1.1 Educational Program Development and Implementation](#)

[1.6 Food and Nutrition](#)

[1.8 Use of Artificial Intelligence \(AI\) Technology](#)

[6.4 Acceptance and Refusal of Authorisations](#)

[6.5 Interactions and Communication with Families](#)

[6.6 Community Communication and Participation](#)

[6.7 Feedback and Complaints Handling](#)

[6.11 Cultural Safety](#)

[7.14 Social Media and ITC Usage for the Service](#)

Policy 1.3 Sharing the Program and Children's Progress with Families		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – updated format and enhanced procedures		
V1-6.2024 – no updates		
V2-03.2025 – Added procedures on information sharing and partnerships with families		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

1.4 Excursions, Incursions and Regular Outings

Policy Statement

Ensuring the safety, wellbeing, and cultural safety of all children is our highest priority during excursions, incursions, and regular outings. These activities are included in the Service program as a valuable part of children's learning and leisure, aiming to provide children with enjoyment, stimulation, challenge, new experiences and to foster connections between the service and the wider community. Parents/guardians and stakeholders are encouraged to contribute ideas and perspectives to the planning of excursions and incursions and the included activities, especially those that enrich cultural understanding and experiences. The critical aspect for all excursions, incursions and regular outings is to ensure the physical, emotional, and cultural safety and protection of children is maintained throughout.

The Service management understand the inherent risk and matters of compliance associated with excursions and regular outings. Therefore, the following steps will be taken by the Service before any child will be permitted to leave the premises:

- Comprehensive risk assessments will be completed for each excursion and regular outing, identifying all relevant hazards, and ensuring these are appropriately managed/controlled,
- The Approved Provider is to confirm the approval of risk-assessments and activities with significant risk prior to the undertaking of any excursions, and
- Written authorisation from a parent/guardian (or relevant authorised nominee) will be obtained by The Service management following the preparation and approval of the risk assessment.

Each excursion, incursion and/or regular outing will be a well-planned and coordinated event. Methodical steps will be carried out and documented to ensure children are safe and enjoyment of the excursion, incursion and/or regular outing is maximised while also ensuring cultural sensitivity and inclusivity are embedded in the experience.

Definitions:

Excursion: means an outing organised by an education and care service, but does not include an outing organised by an education and care service provided on a school site if—

- (a) the child or children leave the education and care service premises in the company of an educator; and
- (b) the child or children do not leave the school site.

Incursion: means an activity organised by an education and care service, whereby an outside body is employed or engaged to visit the service to run an educational program.

Regular Outing: means a walk, drive or trip to and from a destination –

- a) That the service visits regularly as part of its educational program; and
- b) Where the circumstances relevant to the risk assessment are substantially the same on each outing.

Wherever 'excursion' is mentioned within this policy and procedure it is taken to be inclusive of a 'regular outing', unless specifically mentioned otherwise.

Roles and Responsibilities

Approved Provider	• Ensuring that obligations under the Education and Care Services National Law and National Regulations are met with particular attention to requirements for children's safety and cultural wellbeing. • Take reasonable steps to ensure that Nominated Supervisors, educators, staff and volunteers follow the policy and procedures for excursions and regular outings. • Ensure risk-assessments address and manage all identifiable risks and are conducted prior to the approval of excursions or incursions. • Ensure the service is supported to understand their obligations for risk-assessment and parent/guardian consent to support compliance with regulations.

Nominated Supervisor and/or Responsible Person in charge	• Ensure procedures are followed so that risk-assessments and written parent consent is obtained before children are taken off-site and that these procedures are culturally appropriate. • Undertake a sound risk-assessment process that is collaborative in seeking the input of other educators and considering diverse cultural perspectives. • Prepare and plan - having contingencies for unplanned events including those that might impact children's safety and wellbeing. • Verify all the required equipment and/or items are taken on the excursion (first aid kit, personal medication, medical management plans, mobile phone, emergency contact lists, etc.) • Ensure the risk assessment is available for families to view prior to the excursion and clearly communicates how children's safety and wellbeing will be addressed. • Ensure a new risk assessment is completed when circumstances change for regular outings • Ensure the educator to child ratios are maintained during the excursion and address the risks identified (if applicable)
All Staff	• Support a safe and enjoyable activity with children respecting and valuing their cultural backgrounds. • Follow instruction and risk management plans, implementing strategies to ensure children's safety and wellbeing. • Ensure the required educator to child ratios are followed and children are supervised at all times • Undertake regular head counts to account for all children • Demonstrate responsiveness through positive support to children's behaviours as required with cultural understanding and sensitivity.
Families	• Sign the authorisation forms for their child to attend the excursion and ensure all information required is up to date • Provide written authorisation for their child to leave the service premises on regular outings • Be aware of all the information about the excursion – ask questions if needed especially regarding how their child's cultural, safety and wellbeing needs will be met. • Ensure required medication for the child is in date and available to take on an excursion

Key Tasks and Responsibilities

Risk-Assessment	The Nominated Supervisor will take the primary lead in developing the risk assessment document. A standardised template will be used for all excursions and incursions to ensure all required information is captured. All risk assessment processes will use documentation that satisfies all the legislated requirements for excursion risk assessments, including the specific elements regarding travel as well as assessing and mitigating risks to children's cultural safety and wellbeing. Approved risk assessments developed for excursions will be made available to parents/guardians (or relevant authorised nominee).
Transport	All travel for excursions will uphold high standards of safety and protection. Travel procedures contained in this policy only apply to excursion-related travel. To remove any doubt, educators will not be permitted to transport children in their own private vehicle for excursions or otherwise.
Authorisations	Parent/guardian (or authorised nominee) authorisation will be obtained via the vacation care booking forms (or other alternative authorisation if not part of vacation care). Included in all authorisation forms are the relevant excursion details, including all matters set out in Regulation 102. All authorisations will be stored in a manner consistent with the service's

	record keeping policy (refer policy 7.6 Privacy and Confidentiality of Records). It is the responsibility of the Nominated Supervisor to ensure all authorisations are collected prior to children leaving the service.

Procedures

Excursion/Incursion Preparation and Planning

Children's age, interests and abilities will be taken into consideration when planning excursions. Comments, suggestions and feedback from children and families will also be taken into account with particular emphasis on incorporating diverse cultural interests and preferences. When planning excursions, venue and transport costs will be considered, to ensure that excursions are financially viable and accessible to families.

When planning an excursion that includes water-based activities, the Nominated Supervisor will conduct a risk assessment including strategies and procedures for managing children whilst undertaking such activities. Strategies could include the involvement of qualified educators and supervision management plans.

Alternative arrangements (contingency plans) will be planned in case of changed weather conditions or other unforeseen circumstances or in situations where the planned activity may inadvertently impact children's cultural safety and wellbeing.

The Nominated Supervisor is responsible to consult, plan and investigate potential excursion activities prior to the development and approval from the Approved Provider. No excursion is permitted to be facilitated without the endorsement of the Approved Provider.

Each excursion will have a plan prepared to describe the timeline for events and actions. The Nominated Supervisor is responsible for communicating the excursion plan to educators attending.

Each excursion will have a checklist completed (see [Excursion Checklist](#)) to record the steps taken to manage all the elements of planning and facilitating the excursion. Please note - aspects of the checklist template should be amended to suit the context of each excursion.

The Service will regularly schedule incursions as part of the educational program if we feel it will benefit the children and offer a valuable experience. Risk assessment and planning will be conducted in accordance with the National Regulations and service policies and procedures to ensure an experience that is enjoyable for children and promotes cultural understanding, safety and wellbeing.

Staffing Arrangements

The Nominated Supervisor will ensure that adequate supervision is provided for children and the educator to child ratio determined for the excursion is always maintained.

Staffing for excursions and regular outings will consider:

- the number, age and ability of children including any specific needs related to their safety and wellbeing.
- the activity being undertaken
- risks related to the mode of transport (for example: walking)
- the experience and skill of each educator

Additional educators/staff will be engaged to provide care and support to children with additional needs where necessary, including those with specific cultural or linguistic needs.

Educators will be aware of their responsibility to provide supervision to other responsible adults or volunteers assisting on the excursion/regular outing.

Parent/guardian and Volunteer Participation

The Nominated Supervisor will ensure parents/guardians and volunteers are encouraged/invited to participate in excursions and regular outings when possible, actively encouraging participation from diverse cultural backgrounds to enrich the experience for all children.

Parents/guardians and volunteers cannot be counted as part of the educator to child ratio or be left alone with any child or group of children and must be supervised by an educator at all times.

Prior to participating in an excursion or regular outing, parents/guardians and volunteers will be briefed about the risk assessment, emergency procedures, supervision, privacy and confidentiality in relation to photographs and the use of mobile phones and the importance of upholding children's safety and wellbeing.

Parents/guardians and volunteers will be made aware:

- That smoking and/or vaping is not permitted,
- Of the need to wear appropriate clothing and footwear, while also respecting cultural dress where appropriate,
- That Working with Children Checks and Clearances will be verified, prior to participating in any excursions.
- That the use of personal mobile phones and other devices are not to be used in the presence of any children in the care of the service, including their own child.

Excursion Risk Assessments

Both the Approved Provider and Nominated Supervisor are to ensure a comprehensive risk assessment has been documented and endorsed prior to families having the opportunity to book and authorise their child/ren to attend the excursion. Likewise, the Approved Provider and Nominated Supervisor will ensure all children have written authorisation (as expressed below) before they will be permitted to leave The Service premises.

The Nominated Supervisor will be responsible for facilitating the initial risk assessment for approval. Where possible, the risk assessment should be developed in collaboration with Educators to ensure all identifiable hazards are identified and adequately controlled including potential cultural sensitivities and risks to children's wellbeing. All risk assessments will be prepared on a standardised form to ensure all required details are addressed.

Depending on the level of risk and previous experience, it may be necessary to visit the intended excursion site when conducting the risk assessment. Permission from the Approved Provider will need to be sought before staff are permitted to travel to a possible excursion location during work time.

Exceptions for Regular Outings

A newly developed risk assessment is not required for an excursion if—

- the excursion is a **regular outing**; and
- a risk assessment has already been conducted for the excursion; and
- that risk assessment has been conducted not more than 12 months before the excursion is to occur.

Writing the Risk Assessment

All excursion risk assessments will be completed on the Service's Risk Assessment Template and cover the following requirements—

1. identify and assess risks that the excursion may pose to the safety, health or wellbeing of any child being taken on the excursion; and
2. specify how the identified risks will be managed and minimised with a clear focus on physical, emotional, and cultural safety.

And consider:

3. the proposed route and destination for the excursion,
4. any water hazards,

5. any risks associated with water-based activities,
6. the transport to and from the proposed destination for the excursion, including:
 - a. the means of transportation,
 - b. any requirements for seatbelts or safety restraints under Queensland law,
 - c. the process for entering and exiting:
 - i. the Service premises; and
 - ii. the pick location and/or destination.
 - d. procedures for embarking and disembarking the means of transport, including how each child is to be accounted for on embarking/disembarking,
7. the number of adults and children involved in the excursion,
8. given the risks posed by the excursion, the number of educators or other responsible adults that is appropriate to provide supervision and whether any adults with specialised skills are required (e.g. lifesaving),
9. the proposed activities,
10. the proposed duration of the excursion; and
11. the items that should be taken on the excursion (e.g. mobile phone, emergency contacts).

Excursion Ratios

For all excursions there will be a maximum of 10 school-age children to 1 educator. This may vary with a lower maximum of school-age children to 1 educator, depending on the nature of the excursion, and at the discretion of the Nominated Supervisor.

Before the excursion is due to commence, the Nominated Supervisor will roster on adequate numbers of staff accordingly, and place children into designated groups of the identified number for the type of excursion and as per the risk assessment. Each group is assigned an Educator/s who will then be primarily responsible for regularly conducting headcounts and maintaining supervision of those children.

For all swimming activity excursions there will be a maximum of 7 children to 1 educator including one supervisor. Children will be put into designated swimming groups with an assigned Educator(s) who will then be primarily responsible for regularly conducting headcounts and maintaining supervision of those children.

Endorsement of Risk Assessments

Risk assessments will be required to be endorsed by the Approved Provider. The Nominated Supervisor should make the risk assessment available to the Approved Provider ensuring sufficient time for consideration and approval – at least one week.

Any risk assessments prepared for Vacation Care programs should be submitted to the Approved Provider Executive no later than one meeting prior to the holiday period (e.g. risk assessments would be tabled at the March management meeting for an April holiday period).

Authorisation for Each Child's Participation

Written authorisation from a parent/guardian (or other persons named with authorisation on the enrolment form), will be held by the Service before the child is to be taken off-site. The Service booking forms (typically the Vacation Care booking form) will be created in a manner to provide and collect all relevant details from the parent/guardian or authorised nominee.

The written authorisation for an excursion must contain:

1. the child's name,
2. the reason the child is to be taken outside the premises,
3. the date the child is to be taken on the excursion (unless the authorisation is for a regular outing),
4. a description of the proposed destination for the excursion,
5. the method of transport to be used for the excursion,
6. the proposed activities to be undertaken by the child during the excursion,
7. the period the child will be away from the premises,
8. the anticipated number of children likely to be attending the excursion,
9. the anticipated ratio of educators attending the excursion to the anticipated number of children attending the excursion,
10. the anticipated number of staff members and any other adults who will accompany and supervise the children on the excursion; and

11. that a risk assessment has been prepared and is available at the Service.

All authorisations will be stored in a manner consistent with the protocols set out in policy [7.6 Privacy and Confidentiality of Records](#).

Carrying Out the Excursion

Contingency plans will be created for all planned excursions including plans for situations that might impact children's cultural safety and wellbeing. Communication with impacted families will occur at the earliest possible convenience. Any complaints and feedback can be handled as per the relevant policy.

Children attending the excursion will be required to wear a red shirt and a wristband with the service name and phone number.

Viability of Excursion

Limited bookings impacting viability may result in the excursion being cancelled. Refer policy [6.3 Bookings and Cancellations](#).

Tasks Prior to Departure

1. The Nominated Supervisor will ensure the excursion checklist has been reviewed at least one day prior to the excursion.
2. All educators attending the excursion must read and sign off on the relevant and specific excursion risk assessment/s, prior to attending on the day, confirming their understanding of strategies for ensuring children's physical and cultural safety and wellbeing.
3. Any resources required for the excursion (first aid kits, medication, rolls etc.) will be organised and collated at least the day prior to departure.
4. The Nominated Supervisor will ensure all elements of the excursion checklist have been actioned/addressed prior to departing for the excursion.

During the Excursion

There will be no changes to the notified itinerary except in an emergency and as would ensure the wellbeing and safety of the children.

Educator practices will reflect the actions outlined in the risk assessment, including plans to manage and maintain children's safety and wellbeing during transportation.

The following items will be taken on all excursions and be readily accessible to educators at all times:

- First aid kit, medications and forms, medical management plans and medical devices as required,
- Attendance record/roll and staff roster,
- Emergency contact details and numbers for children and staff; and
- A telephone or access to one,
- Approved equipment for taking photographs etc to record and document children's experiences, always with respect for privacy and cultural protocols,
- Resources to support health and wellbeing such as sunscreen, drinking water, hats and any culturally specific items for comfort or care.

Supervision

Unless otherwise specified in the risk assessment the following procedures will be practiced on excursions:

- Head/face counts will be made at regular intervals and when moving from one area to another.
- educators will provide active supervision, ensuring the appropriate educator to child ratios are maintained at all times.
- toilets and change rooms - where no male (or female) educator is available to supervise the boy's toilets (or girls toilets), female (or male) educators must satisfy themselves that it is safe for the child/ren to access the toilets and will remain in suitable proximity to the toilet area until all child/ren have returned, while being mindful of cultural sensitivities regarding privacy and gender.
- educators will satisfy themselves that all environments are safe for use before allowing the children access to it.

- children will not be left in the sole care and custody of bus drivers (unless the driver of the bus is a paid employee/educator of the service) or any other persons during excursions.

In the event of injury occurring during an excursion, procedures as set out in policy [2.4 Incident, Injury, Trauma and Illness](#) will be followed.

Excursion Evaluation and Reflection

Educators will inform the assessment of the evaluation of the excursion. Typical observations and documentation addressing the children's learning and wellbeing outcomes will be recorded. Additionally, at the next team meeting, the excursion and risk management plans will be evaluated collectively. Where improvements have been identified, these ideas will be recorded and implemented in future plans for excursions with a continuous focus on enhancing physical, emotional, and cultural safety.

Excursion Transport and Travel

The following transportation and travel procedures only relate to travel occurring as part of an excursion. Any other travel related matters are contained in policy [2.15 Transportation \(Other Than Excursions\)](#).

Selecting Transportation

The Service will ensure any transportation of children upholds all relevant legislation and guidelines, including:

- Any vehicles used must be registered for the purpose and in suitable (roadworthy) condition.
- Drivers are to be suitably licensed to carry the required number of passengers.

In selecting transport, the Service will ensure that a communication system is available for use in the event of emergency.

Seatbelts and Restraints

In the case of children being transported in a bus (or car), the following legislative guidelines will be followed:

- Bus transport with 13 or more seats does not need to be fitted with seatbelts and child restraints are not required, however, where possible the Service will select buses/coaches with seatbelts as a preference.
- Australian Standard (AS/NZS 1754) child restraints are required for four to seven-year old when traveling in a car (other than taxi) or a van/bus with 12 or less seats. In these circumstances all passengers have to wear seatbelts.
- Public transport - child restraints are not required on buses, trains, or personalised transport services such as taxi, limousine and ride-booking services.
- Use of personalised transport services such as taxi, limousine and ride-booking services should comply with the transport service's requirements.

Transitioning Between Transport, Premises and Destinations

- The risk assessment prepared for the excursion will set out the specific steps for children:
 - Entering and exiting the service's premises, pick-up location and destination,
 - Embarking and disembarking the means of transport, including how children will be accounted for.
- Generally, the process will be a face count or roll to account for children periodically throughout the excursion and for critical points such as transitioning between locations. Specific steps will be developed as per the context of the excursion.
- Locations for travel embarking and disembarking will consider the relevant risks, where possible the safety location will be selected for transitioning.
- Consideration will be made to appointing a particular educator to the role of accounting for children as they transition between the means of transport and relevant locations.

Transportation Record keeping

The designated driver and designated educator will ensure:

- the Excursion Checklist is completed each time transportation is provided to children
- the Transportation Attendance Record is completed to record:

- each child being signed into the Transportation Attendance Record and out of the Service attendance record, noting the time children enter the vehicle
- each child is signed out of the Transportation Attendance Record and into the Service attendance record noting the time children exit the vehicle
- each child is accounted for as they embark and disembark from the vehicle during transportation
- that once all children have exited the vehicle/bus, a final sweep of the vehicle is conducted by the designated educator/ nominated supervisor, including the interior of the vehicle, checking around and under seats, storage areas and under the vehicle to ensure there are no children or belongings left behind
- a secondary educator conducts a final sweep of the vehicle, including the interior of the vehicle, checking around and under seats, storage areas and under the vehicle to ensure there are no children or belongings left behind
- the second educator will confirm the interior of the vehicle was checked and sign the Transportation Attendance Record

Vehicle Breakdown/Accident

- In the event of an incident occurring during an excursion, procedures as set out in policy [2.4 Incident, Injury, Trauma and Illness](#) will be followed.
- In the event of a vehicle breakdown, while waiting for replacement transport/repairs, children will be kept safe, comfortable and occupied with suitable activities. The Nominated Supervisor or delegate will communicate the situation and remedies to families via relevant communication channels.
- In the event of a late return to the Service, every effort will be made to notify parents/guardians e.g. to arrange for a notice to be displayed at the service or to contact parents/guardians individually.

Emergency Situation

- “C” Class vehicles \ private vehicles will not be used to transport children except in an emergency situation.
- Educators generally will not be permitted to transport children, but if permitted in any circumstances, the following requirements will apply in relation to that educator and the transport used:
 - All vehicles used must be registered in Queensland,
 - Drivers are to be licensed to carry the required number of passengers for the purpose.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.165 Offence to inadequately supervise children
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.99 Children leaving the education and care service premises
 - R.100 Risk assessment must be conducted before excursion
 - R.101 Conduct of risk assessment for excursion
 - R.102 Authorisation for excursions
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children’s health and safety
 - QA4 – Staffing arrangements
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities

Additional Regulatory Context and Guidance

- [Transport Operations \(Passenger Transport\) Standard 2010 \(Qld\)](#)
- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)

- [NQF Child Safe Culture Guide Final 1.pdf](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [1.1 Educational Program Development and Implementation](#)
- [2.1 Providing a Child Safe Environment](#)
- [2.2 Supervision and Educator Ratios](#)
- [2.4 Incident, Injury, Trauma and Illness](#)
- [2.5 Administration of First Aid](#)
- [2.6 Water Safety](#)
- [2.9 Medical Conditions in Children](#)
- [2.10 Administration of Medication](#)
- [2.11 Sun Safety](#)
- [2.15 Transportation \(Other Than Excursions\)](#)
- [3.4 Children's Toileting](#)
- [3.5 Emergency and Safety Equipment](#)
- [6.3 Bookings and Cancellations](#)
- [6.4 Acceptance and Refusal of Authorisations](#)
- [6.5 Interactions and Communication with Families](#)
- [6.6 Community Communication and Participation](#)
- [7.6 Privacy and Confidentiality of Records](#)

Forms and Resources

- [Excursion Permission Form](#)
- [Excursion Risk Management Plan](#)
- [Excursion Checklist Template](#)
- [Swimming Ability Form](#)

Policy 1.4 Excursions, Incursions and Regular Outings		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – updated format and enhanced procedures		
V1-06.2024 – no updates		
V2-03.2025 – Change of name, additional procedures including Transportation record keeping, additional statements relating to staffing arrangements, parent and volunteer participation, incursions		
V3-10.2025– Enhanced policy statement, enhanced roles and responsibilities, enhanced key tasks and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V4-04.2026 – removed duplicated information, added information about mobile devices to parent/guardian volunteer participation		

1.5 Sleep, Rest and Relaxation

Policy Statement

The health, wellbeing and comfort of children attending the Service includes access to sleep, rest and relaxation. The Service will structure the environment, practices and program to ensure children needing or seeking calmer and quieter areas for play and leisure can access these when required, always ensuring these spaces are culturally safe and responsive to individual needs.

The age, developmental stage and the individual need of each child is a central component of the planning and structure of the program. We recognise that each child is unique and their requirements for sleep and rest will vary. The program will be developed to consider the variability and diversity of children's needs including their cultural backgrounds and any associated practices or preferences regarding sleep and rest.

Parents/guardians are welcome and encouraged to discuss and contribute to the planning of the program to ensure their child's individual sleep, rest and relaxation needs are met and that these discussions are conducted with cultural sensitivity and respect.

The Service physical environment will be shaped to offer inviting areas for calm and restful play. Resources and facilities where children can lay down in comfort will be available during all sessions. If needed, children will be provided with a suitable area to sleep. Where resources such as bedding and linen is used, these will be cleaned and appropriately stored after each occasion adhering to best practices for hygiene and comfort.

Roles and Responsibilities

Approved Provider	• Ensure a specific sleep and rest risk assessment is conducted at least annually to ensure all potential hazards are controlled in sleep or rest areas. • Support the service's planning, facilities and resources to promote a diversity of experiences including those that support a child's need for rest and sleep ensuring equitable access and cultural appropriateness.
Nominated Supervisor	• Review the sleep and rest specific risk assessment at least annually to ensure all potential hazards are controlled in sleep or rest areas • Liaise with parents and families about children's needs for rest and sleep and plan and support accordingly, ensuring these interactions are culturally sensitive and respectful of family practices. • Ensure the area for sleep and rest is well ventilated and has natural lighting and promotes a sense of peace and security for all children. • Ensure educators provide safe and adequate supervision when children are sleeping or resting, ensuring staff understand their roles in maintaining child safety and wellbeing. • Lead reflection on the service's program and planning to facilitate a range of experiences and opportunities for children including those that support children's rest and relaxation, actively seeking feedback from children and families to ensure their cultural safety and wellbeing are paramount.
All Staff	• Have a thorough understanding of the service's policy and practices and embed practices to support safe sleep/rest into everyday practice, especially regarding child safety and cultural respect. • Support children to access opportunities for sleep, rest and relaxation as required and being responsive to individual cultural preferences and needs. • Ensure children are provided with a high level of safety when sleeping and resting and every reasonable precaution is taken to protect them from harm and hazard. • Maintain adequate supervision and ratios throughout any rest period. • Encourage children to dress appropriately for the room temperature when resting. Lighter clothing is preferable, with children encouraged to remove

	shoes, jumpers, jackets and bulky clothing while being mindful and respectful of any cultural attire or personal preferences. • Monitor the room temperature to ensure maximum comfort for the children • Ensure physical spaces are configured and are made available for quiet and restful activities, creating welcoming and inclusive environments that support diverse forms of rest and relaxation.

Key Tasks and Responsibilities

Sleep and Rest Facilities	The Approved Provider is to ensure sufficient facilities and physical space is available for children's access to sleep and rest. The Nominated Supervisor will ensure the facilities are appropriately maintained and used, including reporting additional requirements or improvements.
Supporting Rest	The Nominated Supervisor and Educational Leader are responsible for the coordination and plans and practices to ensure children have access to suitable rest and sleep settings. Educators are to use their insight into the needs of children and provide access to relevant facilities, tailoring support to respect individual and cultural needs for rest and relaxation.

Procedures

Recognising Children's Needs

The Service defines 'rest' as a period of inactivity, solitude, calmness or tranquillity, and can include a child being in a state of sleep. Considering the busy and energetic nature of a child's day, we feel that it is important for children to participate in a quiet/rest period after school if required, to rest, relax and recharge their body.

All educators will be provided with instruction around children's rights to rest, relaxation and leisure. Additionally, the wellbeing and comfort of children will be an ongoing aspect of reflection surrounding the program. The service will be responsive to the needs of children, demonstrating flexibility around how the program is facilitated. Where needed, children are welcome and encouraged to engage in sleep, quiet and/or downtime experiences, ensuring these opportunities are respectful of cultural practices around rest.

Shaping the Environment for Rest and Relaxation

As part of the educational program, restful activities and downtime experiences will be offered throughout the session/day. Where a child is displaying characteristics of fatigue and tiredness, educators will encourage and support the child to access the relevant quiet areas.

For every session of care, the physical environment is thoughtfully configured so children can access a range of play types, including downtime, restful and quiet experiences away from activities where robust or energetic play is occurring and creating spaces that are welcoming and culturally safe for all children.

Sleep and Rest Risk Assessment

The Approved Provider, in conjunction with the Nominated Supervisor and educators of the Service, will conduct a comprehensive risk assessment in order to identify any potential risk/s or hazards and ensure the safety of all children during sleep, rest and relaxation times. This assessment will explicitly incorporate child safe practices, focusing on creating environments free from abuse and neglect and ensuring children's cultural safety.

The risk assessment will be reviewed at least annually or after being aware of an incident or circumstance where the health, safety or wellbeing of children may be compromised during sleep or rest. All risk assessments will be regularly assessed and evaluated as to facilitate continuous improvement at the Service with findings used to strengthen child safety practices and cultural responsiveness.

If a risk concerning a child's safety during sleep and rest is identified during the risk assessment, the Approved Provider must update this policy and procedure as soon as possible. The risk assessment must be stored safely and securely and kept for a period of at least 3 years.

The Service Sleep, Rest and Relaxation risk assessment will consider and include the following information:

- the number, age, developmental stages and individual needs of children,
- the sleep and rest needs of individual children being educated and cared for (including specific health care needs, cultural preferences, sleep and rest needs of individual children and requests from families about a child's sleep and rest),
- the suitability of staffing arrangements to adequately supervise and monitor children during sleep and rest periods,
- the level of knowledge and training of staff supervising children during sleep and rest periods including training on cultural competence and child protection,
- the location of sleep and rest areas,
- any potential hazards:
 - in sleep and rest areas,
 - on a child during sleep and rest periods (such as jewellery, clothing) while being sensitive to cultural adornments that do not pose a safety risk.
- the physical safety and suitability of sleep and rest environments (including temperature, lighting and ventilation), ensuring these environments contribute to overall child safety and wellbeing.

Collaborating with Families

Like all aspects of care and programming, families are encouraged to discuss their child's needs with the Service leadership team so these can be included in routines and practices and ensuring these conversations are culturally respectful and acknowledge the diverse family structures and practices. Where specific and intensive sleep and rest is required, individual plans will be created.

As part of the ongoing development of the program, educators will continue to consult with children around preferences for rest and relaxation at OSHC. Where preferences are identified, these will be documented and included in critical reflection and planning, ensuring children's voices are heard and respected.

Protocols for Children Wanting Sleep

Where a child is seeking an area to sleep or rest, then a temporary bed/mattress will be laid out for them to use. Bedding that is stored in the storeroom can be used to make the child comfortable.

The area will be kept free of active games or loud activities to be as reasonably quiet as possible. An educator will position themselves to supervise the general area where the child is resting.

Once the child has finished sleeping or resting all bedding will be placed in the hamper for washing. All bedding must be washed after a single use. Clean bedding is returned back to the storeroom for storage.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Regulations:**
 - R.84A Sleep and rest
 - R.84B Sleep and rest policies and procedures
 - R.84C Risk assessment for purposes of sleep and rest policies and procedures
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA1 – Educational program and practice

- QA2 – Children’s health and safety
- QA3 – Physical environment
- QA5 – Relationships with children
- QA6 – Collaborative partnerships with families and communities

Additional Regulatory Context and Guidance

- [Queensland Health - Healthy sleep in children factsheet](#)
- [Article 31 of the UN Convention on the Rights of the Child](#)
- [NQF Child Safe Culture Guide Final 1.pdf](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[1.1 Educational Program Development and Implementation](#)

[2.1 Providing a Child Safe Environment](#)

[2.8 Hygiene, Health and Wellbeing Practices](#)

[2.14 Child Protection and Mandatory Reporting](#)

Forms and Resources

[Risk Assessment Template - Sleep and Rest](#)

Policy 1.5 Sleep, Rest and Relaxation		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – addressing regulatory changes		
V1-06.2024 – no updates		
V2-03.2025 – Name change, added information for all role and responsibilities, reworded information relevant to Children’s sleep and rest needs, additional procedures relevant to sleep and rest risk assessments, reworded protocols for children wanting to sleep.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced key tasks and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

1.6 Food and Nutrition

Policy Statement

The Service provides food as part of the service's education and care, recognising and acknowledging the importance of providing food that is both nutritious and appropriate to the needs of the children. We encourage and promote the health and wellbeing of children by providing positive learning experiences during meal/snack times where good nutritional food habits are developed in a happy, social environment that is culturally inclusive and respects diverse dietary requirements. Parents/guardians are supported to understand the benefits of this approach to nutrition for their children.

The food and meals provided by the Service will be adequate for the situation. To be positioned to provide safe and well-prepared snacks, the educators will prepare the food items for the service onsite on the day of consumption. The development of the menu still draws upon children and family's preferences with a strong emphasis on cultural diversity and dietary requirements to ensure cultural safety and inclusion for all children.

Where desired, children will also be able to access food they may have brought to the service in their lunchbox, provided it aligns with the service's health and safety guidelines. Drinking water will always be available and accessible to children.

Health and Nutrition Guidelines

The Service menus and food available will be based on information from recognised health authorities, such as government health department and other organisations with recognised expertise in nutrition (e.g. Nutrition Australia, Heart Foundation, Queensland Health). The primary guidelines for menu items will be based on the National Health and Medical Research Council's 'Australian Dietary Guidelines' and Queensland Education's Smart Choices strategy, while also integrating culturally diverse food options and considering specific dietary needs based on cultural or religious beliefs.

Importantly the Service recognises the following key points from the Australian Dietary Guidelines:

- Children and adolescents need sufficient nutritious foods to grow and develop normally.
- In enjoying a wide variety of nutritious foods. Children adolescents should be encouraged to:
 - eat plenty of vegetables, legumes and fruits.
 - eat plenty of grain (cereal) foods, (including breads, rice, pasta and noodles), preferably wholegrain.
 - include lean meat, fish, poultry and/or alternatives.
 - include milks, yoghurt, cheese and/or alternatives.
 - Reduced fat varieties should be encouraged.
 - choose water as a drink.
- Likewise, care should be taken to:
 - limit saturated fat.
 - choose foods low in salt.
 - consume only moderate amounts foods containing added sugars.
- Prepare and store children's food safely.

The Eating Environment

Outside of the food provided by the Service, we are committed to promoting healthy eating habits and providing nutritious food and drinks that meet the needs of children. We aim to influence children and families about making informed food choices and to create a positive and enjoyable eating environment where children feel safe, respected, and their cultural identities are acknowledged and celebrated through food. Educators will encourage and involve children in conversations and routines that promote healthy eating and good nutrition, fostering an appreciation for diverse cooking traditions.

Programming – Food Based Activities

Cooking and preparing food with children also serves as a valuable program activity. Educators will ensure these activities reflect a safe environment for children's participation and consumption. Relevant precautions will be taken to consider the need for specific risk assessments, based on the nature of the activities and environment and ensuring these activities are culturally appropriate and inclusive.

Roles and Responsibilities

Approved Provider	• Ensure the service has established sound food and nutrition practices that are culturally sensitive and promote children's overall wellbeing. • Ensure new staff and educators are aware of food practices and procedures as outlined in this policy during induction and orientation with a particular focus on cultural safety in food preparation and serving. • Ensure water is readily available for children to drink
Nominated Supervisor	• Ensure the weekly menu is displayed in an accessible and prominent area for parents/guardians to view and includes information about culturally diverse options. • Ensure the weekly menu is accurate and describes the food and beverages provided each day of the week including notes on cultural considerations. • Not allow food to be used as a form of punishment or to be used as a reward or bribe, upholding children's dignity and rights. • Monitor and respond to food safety issues ensuring all practices adhere to health and safety regulations. • Ensure food purchased, stored and served is consistent with risk-assessment and management plans and addresses diverse dietary needs. • Ensure communication with parents/guardians is effective and culturally appropriate. • Facilitate opportunities for child, parent/guardian and educator involvement in menu design and food ideas, actively seeking input from diverse cultural backgrounds to enrich the menu and ensure cultural safety.
All Staff	• Source opportunities to involve children in the food and nutrition program including culturally significant food-related activities. • Equip children with self-help and independence skills. • Monitor children for allergic reactions or safety issues relating to food and implement clear emergency procedures. • Involve children in positive meal time experiences and encouragement of 'smart choices' and healthy foods while respecting cultural food practices. • Supervise children whilst eating and drinking • Not use food as a reward or withhold food from children for disciplinary purposes, maintaining a respectful and supportive environment. • Participate in regular professional development to maintain and enhance knowledge about childhood nutrition and food safety practices including cultural competence in dietary needs. • Ensure food handling and storage practices are reflective of service policy and procedures, and relevant regulations. • Ensure children have access to and encouragement to consume to adequate drinking water, especially in hot weather.

Key Tasks and Responsibilities

Menu Development	The Approved Provider will ensure the relevant guidelines are available to ensure the food available to children is suitable. The Nominated Supervisor is to monitor the menu planning to ensure it reflects the relevant guidelines and expectations and importantly, promotes cultural safety and wellbeing by offering diverse and inclusive food options.

Food Preparation and Handling	The Nominated Supervisor or Responsible Person will monitor educator practices to ensure the food safety program is followed. The Nominated Supervisor will also ensure educators access relevant training and instruction, and the cleanliness of food preparation area is maintained adhering to the highest standards of hygiene and safety.
Eating Environment	The Nominated Supervisor and Responsible Person is supported by educators to ensure the eating environment remains a pleasant and suitable space for children to consume meals and socialise, fostering a sense of belonging and cultural safety for all children.

Procedures

Menu Development

Health and Nutrition

The Nominated Supervisor will be responsible to:

- regularly review, and when necessary, ensure that the service obtains formal reviews of this Food and Nutrition Policy from a recognised nutrition authority or a person duly qualified to advise in relation to it.
- Consult with the Approved Provider at least once a year and otherwise whenever a change is made to this Food and Nutrition Policy.

Where the Service provides food, educators will seek to provide food, which:

- is healthy, balanced, varied, age appropriate and consistent with Dietary Guidelines for Children and Adolescents in Australia (NHMR) 2003,
- includes a good balance of fresh foods, as opposed to pre-packaged and prepared foods,
- as far as reasonably possible, meets the dietary needs of children with special dietary needs of which the service has been made aware, or becomes aware, including cultural, religious, or ethical dietary requirements.

The Nominated Supervisor will discuss with all parents/guardians any food allergies and restrictions (including cultural or religious) which are required by the parent/guardian to be enforced at the service. Details of these restrictions will be noted on the enrolment form and passed on to educators. Food allergies or restrictions which are based on health reasons should be accompanied by a letter from a medical practitioner or other health professional.

The Service will seek to accommodate all such reasonable nutritional needs of a child by giving appropriate directions to educators in relation to that child, ensuring their cultural safety and wellbeing are prioritised.

Service menus are planned on a regular basis using a checklist (as provided in the PANOSH resource) to ensure food provided is varied and encompasses all the food groups. Persons tasked with developing menu plans will have relevant understanding of nutritional guidelines, procedures and requirements of the service to serve adequate, healthy and nutritious food while also being knowledgeable about cultural food practices.

The Service will continually consider the additional training needs, and where relevant, educators will be encouraged to attend professional development on food and nutrition themes including training on culturally competent food practices and allergy management.

A menu for the week will be displayed near the entrance of the OSHC building and on the fridge and will accurately describe the foods to be served throughout the week with clear labelling of allergens and cultural/dietary considerations.

Developing a Menu Plan

The Service provides breakfast and afternoon tea for the relevant sessions of care. A weekly menu is prepared to ensure the food provided reflects the relevant guidelines for nutrition and healthy eating.

- The Service menus are planned collaboratively with educators, children and families of the service. The menu is designed to ensure food provided is varied and encompasses all food groups and is inclusive of diverse cultural preferences.

- All menus will be planned in advance (at least the week prior).
- Special dietary needs will be provided for with relevant alternatives or where otherwise impractical, the Nominated Supervisor will consult with parents/guardians and where necessary, the meal will be supplied from home. When parents/guardians provide food for their child, healthy food and drink choices are encouraged.
- Food or beverages provided will take into account any specific cultural or religious requirements, ensuring cultural safety and respect.
- Consideration will be given to preferences of children.
- Children, families and other educators are encouraged to contribute ideas for the menu.
- The Nominated Supervisor will support menu preparation and purchasing to ensure adequate quantity

Drinking Water

- The Nominated Supervisor will ensure that children have ready access to cool drinking water.
- Water will be the preferred drink, however, milk and other drinks may be available on occasions
- Educators will encourage children to drink extra water during the summer months.
- Educators will encourage parents/guardians to provide children with water to take with them on excursions.

The Eating Environment

Mealtimes and the interactions that occur when eating contribute to the learning outcomes and experience of children. The eating environment will be shaped to be a calm and enjoyable setting that fosters social connections and respects individual differences, promoting cultural safety for all.

Safe and Pleasant Environment

- Children must wash their hands prior to mealtimes following the steps contained in policy [2.8 Hygiene, Health and Wellbeing Practices](#).
- Educators will promote a calm and hygienic eating setting by encouraging children to sit whilst eating. To promote a suitable environment, meal and snack times will follow a daily routine that is flexible and child-centred, allowing for cultural variations in eating practices where appropriate.
- Educators will sit with children during meals to provide supervision, encourage healthy eating, and promote positive behaviour.
- When children are finished eating, they will follow routines to leave the area tidy and place items in the washing up.

Serving of Food

- Independence will be fostered by encouraging children to serve themselves food, under supervision from educators, using appropriate equipment while being mindful of any cultural practices around serving or sharing food.
- If educators need to serve food to the children, tongs and/or gloves will be used.
- At meal/snack times, educators will encourage children to try different foods and to take appropriate portions.
- An adequate quantity of food will be available, but children should take an appropriate initial portion and come back if more is required.

Diverse Cultural Experiences

- Food provided includes food from various cultures particularly those represented in the service and local community, actively promoting cultural understanding and appreciation through cooking experiences.
- Families from other cultures within the service or wider community may be invited to participate in the program, providing children with food experiences from their own culture, fostering a sense of belonging and pride in their heritage.
- Food awareness activities will be chosen from a variety of cultures and may include:
 - a. different ways of serving the food (i.e. chopsticks),
 - b. different varieties of foods (e.g. feta cheese instead of cheddar),
 - c. foods that may have significance within their culture (e.g. Anzac biscuits and their origin), exploring the cultural stories and meanings behind foods.

Allergies and Dietary Restrictions

- Children with allergies or other dietary restrictions will have specific plans developed as per policy [2.9 Medical Conditions in Children](#), ensuring their safety and wellbeing are paramount.
- Consistent with regulatory requirements, educators will be informed of any allergies, intolerances, or specific dietary needs of children and the plans prepared for their management with particular attention to cultural or religious dietary requirements.
- Suitable alternatives will be provided for children with special dietary needs.
- Educator's training and risk minimisation plans will capture the management process to minimise cross contamination, with alternative foods kept and prepared separate from other foods to ensure the highest level of safety.
- Children with relevant allergies will be monitored throughout food service and eating times to ensure their wellbeing and safety.

Food Experiences

Food will not be used in the Service as punishment or reward for children. Educators involve and consult children when planning the menu and/or food activities and experiences through group meetings and/or children's suggestions. Educators will ensure healthy food options are considered as first preference with occasional foods being kept to a minimum while also embracing culturally significant foods as part of a balanced diet.

Educators will encourage and involve children in conversations and routines that promote healthy eating and good nutrition and when planning cooking experiences for the program, healthy food options are considered as first preference with occasional foods being kept to a minimum.

Cooking experiences will be regularly provided as part of the Service program to enhance children's life skills and provide an opportunity to promote healthy eating and will have a completed risk assessment conducted prior to implementation. During any cooking experience, educators will be vigilant to ensure that the experience remains safe, and relevant food hygiene practices are adhered to. Parents/guardians may be required to provide written permission prior to their child participating in cooking activities that include cutting with knives to using hot cooking utensils and equipment.

Cooking, Food Preparation and Service with Children

Children's involvement with food preparation and serving will be promoted and explored as much as possible through 'serve-yourself' routines and activities such as breakfast meals, encouraging independence and cultural sharing around food.

Play and learning activities surrounding food, such as cooking will be included as part of the program to enhance children's life skills and provide an opportunity to promote healthy eating and explore the cultural significance of food.

Safety around food activities

All times children are handling food, they must follow the service's hygiene practices, including handwashing.

Children will not be allowed in the kitchen or food preparation area unsupervised. Food activities that require heating and/or cooking will be fully risk assessed and supervised by an educator.

Children who are unwell will not be permitted to handle food consumed by others.

Risk assessments will be written to manage any significant risks associated with heat, knives and other potential hazards.

Partnering with Families

Sharing Information

Parents/guardians are responsible for communicating any dietary needs or restrictions. Generally, this information is captured on enrolment. Parents/guardians can update the service at any time, should a

condition emerge and the service will ensure that information about cultural or religious dietary needs is respectfully collected and acted upon.

The food provided by the Service is planned ahead and menus are displayed in a prominent place for families and children with clear communication about how cultural diversity is represented.

Through the Family Handbook, parents/guardians are alerted to the Service nutrition policy and invited to contact the Nominated Supervisor at any time to discuss any comments, concerns or feedback in relation to the Food and Nutrition Policy, and of their child's particular dietary requirements for health or other reasons including those based on cultural or religious practices.

The Nominated Supervisor will arrange at least one opportunity every twelve months for parents/guardians to have input into the Food and Nutrition Policy actively seeking diverse cultural perspectives.

Food Provided by Parents/guardians

Where parents/guardians provide food for their children:

- The Service will promote relevant nutritional information as well as suggestions for healthy food and drink choices.
- If a child has special food needs e.g. cultural requirements or food allergies, the Service will work with parents/guardians to develop a plan to meet the child's needs. Parents/guardians will advise the Service of any changes ensuring open and culturally sensitive communication.
- Food provided for special occasions will adhere to the requirements of this policy and procedure while acknowledging and accommodating culturally significant celebratory foods where safe and appropriate.
- Provision for storage of food for children may be available during vacation care.
- Any issues will be addressed and planned with each individual family directly.

Families are encouraged to provide healthy, minimally processed snack foods with the essential nutrients in the children's lunch boxes during vacation care.

Professional Development

The Service management will ensure that food handlers are provided with adequate training and instruction in relation to food handling and storage procedures including training on cultural food safety practices and allergy management.

The Service will ensure that information and/or fact sheets relating to food safety and nutrition are readily available. If required, further training will be made available with resources that are culturally relevant and accessible to all staff.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.77 Health, hygiene and safe food practices
 - R.78 Food and beverages
 - R.79 Service providing food and beverages
 - R.80 Weekly menu
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety

- QA3 – Physical environment
- QA4 – Staffing arrangements

Additional Regulatory Context and Guidance

- [Food Act 2006 \(Qld\)](#)
- [Australian dietary guidelines - National Health and Medical Research Council's](#)
- [Queensland Education's Smart Choices strategy](#)
- [NQF Child Safe Culture Guide Final 1.pdf](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[1.1 Educational Program Development and Implementation](#)

[2.7 Infectious Diseases](#)

[2.8 Hygiene, Health and Wellbeing Practices](#)

[2.9 Medical Conditions in Children](#)

[2.12 Safe Food Handling, Preparation and Storage \(Food Safety Program\)](#)

[7.12 Workplace Health and Safety](#)

Policy 1.6 Food and Nutrition		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – updated format and enhanced procedures		
V1-06.2024 – no updates		
V2-03.2025 – Added information for all role and responsibilities, additional procedures relevant to food experiences and food provided by parents.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced key tasks and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

1.7 Screen-Time and Media Viewing

Policy Statement

The Service recognises and acknowledges that screen time and media viewing form part of a varied and balanced program, relevant to the needs and interests of children. Therefore, this policy aims to establish clear and healthy guidelines for children's screen time and media viewing limits while at the Service.

The Service acknowledges the significant impact that screen time can have on children's physical activity, movement and overall development. The service's program is designed to reflect the need for health promotion, prioritising active play and balancing children's diverse developmental and wellbeing needs. Digital technology and media items will only be used as a purposeful and limited extension to the daily program assisting in the holistic development of each child's social, physical, emotional, cognitive, language and creative potential. We understand that digital technology can be a powerful tool for learning, cultural sharing, and celebrating diversity, but its use must always be balanced and purposeful within an inclusive, equitable, and inherently safe educational program.

Definitions

'Screen Time': Refers to the time children spend actively engaged with electronic screens, including televisions, computers, tablets, smartphones, and gaming consoles. This policy aims to guide healthy limits and purposeful use of such time.

'Media' refers to the communication channels through which news, entertainment, data or promotional messages are disseminated. Media includes every broadcasting medium such as newspapers, magazines, TV, radio, billboards, direct mail, telephone, fax and internet. 'Media' also includes data storage material recorded on disks, tapes, CD's, DVD's and SD cards.

'Copyright' is the legal right granted to an author, composer, playwright, publisher, or distributor to exclusive publication, production, sale, or distribution of a literary, musical, dramatic, or artistic work.

Roles and Responsibilities

Approved Provider	- Establish, regularly review, and implement policies that reflect the highest standard of care expected for the service, specifically addressing child safety, wellbeing, and the responsible and limited use of screen time. - Actively promote, foster and support a child-safe environment that extends to all digital and online interactions, ensuring that screen time is supervised and purposeful. - Prioritise the ongoing safeguarding of children in our care and ensure immediate notification and reporting of any inappropriate interaction with a child or children that may occur through exposure to harmful digital content during media viewing.
Nominated Supervisor	- Ensure the program and delivery of service consistently meets the expectation of this policy regarding technology use, especially concerning screen time limits and media content. - Strategically ensure the physical location of all digital technology/equipment used for media viewing or screen time allows educators to maintain clear line-of-sight and audible supervision of children at all times, preventing isolated or unsupervised digital engagement. - Support the ongoing professional development of Educators to ensure they possess the knowledge and skills to guide children in safe digital practices and provide timely help and support when needed, particularly in managing screen time and promoting healthy media consumption. - Actively promote supportive workplace cultures including collaboration with other Educators to ensure the safety and wellbeing of all children, encouraging open communication about online concerns, and consistent application of screen time guidelines.

	• Set and uphold high expectations for Educator conduct regarding digital technology use, both personal and service-related, and support their wellbeing where required to ensure they can model safe practices and effectively manage children's screen time. • Diligently limit the amount of time children spend on screens within the program, strictly adhering to recommended screen times and ensuring a healthy balance with physical activity and other play.
All Staff	• Ensure any media viewed or accessed by children is consistent with the services standards for rating/classification, always prioritising age-appropriateness and safety of the content being viewed. • Build on children's learning and inspire the ongoing and enthusiastic acquisition of knowledge through technology, while always teaching responsible and safe digital citizenship, including thoughtful choices about screen time. • Actively engage with individual children to understand their unique developmental and wellbeing needs, interests, and cultural identity, informing personalised approaches to safe digital engagement and media viewing habits. • Immediately intervene to protect children whenever any harmful content is observed being screened, either by the service or individual children on their own personal device, promptly ending exposure and following established incident response protocols.

Procedures

Service Responsibilities

To ensure compliance with the relevant Australian Copyright Laws, the Service will ensure current licences are held for:

- The 'public' viewing of films, DVDs, videos and television within the Service; and
- The 'public' performance, broadcast or communication of music within the Service

The Service will ensure that children's screen time and media viewing are purposefully incorporated as part of a varied and balanced program designed to enhance children's learning and experiences while in care. It will be reflective of a holistic assessment of the child's day and prioritise opportunities for physical activity outdoor exploration, social interaction, and their overall health promotion to ensure screen time does not displace these crucial activities.

The Service will actively collaborate with families and children in setting clear guidelines for media viewing and screen time within the program fostering a shared understanding of healthy digital habits. Strategies implemented may include designated limited times for media and/or technology viewing and explicit discussions about online safety rules.

In upholding our commitment to children's health, physical activity and wellbeing, access to digital technology and devices (i.e. screen-time) will be purposefully limited and balanced with other activities:

- BSC or ASC sessions - devices are only to be used for homework or other research activities, under direct supervision.
- Vacation Care sessions - some restricted leisure time is made available with clear times set out in the program and strict supervision protocols in place. This may include the use of children's personal and service owned devices that have access to the internet and only with explicit parental consent and adherence to all safety guidelines.

The use of TV and watching DVD's will be kept to a minimum and integrated purposefully into the program. Shows depicting violence and/or inappropriate content (including graphic news reports) will be strictly prohibited and not shown under any circumstances.

The Service will ensure that all material viewed by children as part of the educational program is age-appropriate and consistent with the Australian Film and Literature Classifications:

- **(G) General** - The content is **very mild** in impact and is for general viewing. However, some G-classified films or computer games may contain content that is not of interest to children; or
- **(PG) Parental Guidance** – The content is **mild** in impact, however, films and computer games may contain content that a parent/guardian might need to explain to younger children as it may be confusing or upsetting to them. Educators will provide guidance and discussion around PG content, ensuring children understand the material being viewed.

Educator Responsibilities

Educators will ensure that all material viewed by children, whether provided as part of the Service program or bought from a child's home, is checked for age-appropriateness, consistency with Australian Film and Literature Classifications (G) or (PG), and alignment with our digital safety standards and screen time guidelines. The Service will explicitly request that children only bring movies, games, or music that are demonstrably suitable for viewing and align with our child safety principles and purposeful screen time approach.

Family Responsibilities

Parents/guardians will ensure that all movies, games or music bought to the Service by their children are fully consistent with this policy and are G or PG-rated, and do not contain any content that could compromise the safety or wellbeing of other children or contribute excessively to their screen time.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety
 - QA6 – Collaborative partnerships with families and communities.

Additional Regulatory Context and Guidance

- [Australian 24-Hour Movement Guidelines for Children and Young People \(5-17 years\)](#)
- [Copyright Act 1968](#) and [Copyright Regulations 2017](#)
- [Childcare.pdf \(onemusic.com.au\)](#)
- Queensland Government [Statement of Shared Commitment](#)
- [NQF Child Safe Culture Guide Final_1.pdf](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related policies and procedures

- [1.1 Educational Program Development and Implementation](#)
- [2.1 Providing a Child Safe Environment](#)
- [2.14 Child Protection and Mandatory Reporting](#)
- [2.16 Safe Use of Digital Technologies and Online Environments](#)
- [2.17 Child Safety and Wellbeing](#)
- [5.5 Promoting Protective Behaviours](#)
- [6.10 Children's Property and Belongings](#)
- [7.14 Social media and ITC Usage for the Service](#)

Forms and Resources

[Digital Technology/Online Environment Authorisation Form](#)
[Service Owned Digital Device Register](#)

Policy 1.7 Screen-Time and Media Viewing		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – updated format and enhanced procedures		
V1-06.2024 – no updates		
V2-03.2025 – Added information to policy statement regarding use of media and technology in the program, added information for all role and responsibilities, additional procedures relevant to copyright licensing, TV and DVD viewing, additional references sources.		
V3-10.2025 – Policy name change, enhanced policy statement, additional definitions, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

1.8 Use of Artificial Intelligence (AI) Technology

Policy Statement

The Approved Provider is committed to the safe, ethical, and responsible use of Artificial Intelligence (AI) within the education and care service. AI may be used to support administrative efficiency, enhance program planning, and strengthen communication; however, it must never replace professional judgement, relationships, or the rights, safety, and wellbeing of children.

This policy establishes clear, practical guidelines for the responsible and ethical use of AI tools across our Service. It applies to all staff including the Nominated Supervisor, Coordinators, Educators, administrative personnel, and any volunteers who may use AI tools in the course of their role.

This policy covers all AI-driven platforms used in connection with Service operations, including generative AI chatbots and writing assistants (e.g. Claude, ChatGPT, Gemini), AI-assisted scheduling or booking tools, AI features embedded in approved OSHC management software, and image or content generation tools. All use of AI will align with the National Quality Framework (NQF), My Time, Our Place (MTOP), privacy legislation, and child safe principles. The service prioritises confidentiality, informed consent, and the protection of children's information at all times.

Definitions:

Artificial Intelligence (AI): Digital tools or systems that generate content, analyse data, or assist decision-making (e.g., text generators, documentation tools, image creators).

Personal Information – Any sensitive data that could identify a child or family, including images, names, developmental records, or health information.

Roles and Responsibilities

Approved Provider	• Select and approve specific AI platforms that meet national privacy and data security standards. • Provide funding for secure, "enterprise-grade" AI tools rather than free, unsecured versions. • Ensure only approved AI tools are used consistently and effectively by all people engaged with the Service. • Ensure the use of AI aligns with the Privacy Act and National Quality Standards (NQS) to maintain the confidentiality of children, family and staff information in all AI generated documents.
Nominated Supervisor	• Only use AI tools that have been officially sanctioned by the Approved Provider. • Provide guidance and support to educators on appropriate AI use. • Facilitate professional development for staff on AI literacy, prompt engineering, and ethical risks. • Ensure all AI-generated content is reviewed and aligns with service philosophy and regulatory requirements • Monitor compliance with privacy and confidentiality obligations • Facilitate family awareness and consent processes • Address any misuse or concerns promptly
Educational Leader	• Only use AI tools that have been officially sanctioned by the Approved Provider. • Conduct regular audits of AI-generated documentation to ensure accuracy and "human" authenticity. • Support Educators to use AI tools for program planning and generating activity ideas • Ensure program documentation reflects authentic educator practice and is reviewed, edited, and approved before use.

	• Ensure AI-assisted planning is consistent with the learning outcomes and the observed interests and needs of the children attending the Service.
Educators	• Only use AI tools that have been approved by the Approved Provider. • Use AI in accordance with this policy and service expectations • Ensure all AI-generated content is reviewed, accurate, and meaningful • Maintain confidentiality and never input identifiable information into AI tools • Use professional judgement at all times • Inform the Nominated Supervisor of any concerns, risks, or breaches • Engage in ongoing learning regarding ethical AI use

Procedures

Artificial Intelligence (AI) will be used in ways that uphold children's safety, wellbeing and rights at all times, with human decision-making and professional judgement taking precedence over any AI-generated content. The Service is committed to maintaining strict confidentiality, ensuring that sensitive or identifiable information is protected and only used in accordance with privacy requirements. Families will be informed about how AI may be used within the service, supporting transparency and trust. All use of AI will be accountable, ethical and regularly reviewed to ensure it aligns with legislative requirements, service policies, and the ongoing commitment to quality improvement.

Acceptable use of AI

Artificial Intelligence (AI) may be used within the service as a supportive tool to enhance practice and efficiency. This includes assisting educators with generating ideas for program planning, supporting reflective practice, drafting administrative documents such as policies and templates, and developing general communication drafts for families, which must always be reviewed and finalised by the Nominated Supervisor or Responsible Person. AI may also be used to support professional learning and research to strengthen knowledge and practice.

AI may be used for the following purposes:

- Drafting family communications (newsletters, permission notes, policy updates),
- Generating program planning ideas and activity resources aligned with MTOP outcomes,
- Summarising staff meeting notes or professional development reflections (as long as information is de-identified),
- Drafting or reviewing service policies and Quality Improvement Plan (QIP) sections,
- Writing job advertisements, position descriptions, or induction checklists,
- Administrative tasks: email drafts, timetables, rostering templates,
- Brainstorming inclusion strategies or behaviour guidance approaches (de-identified).

AI must not be used to upload, store, or share any identifiable or sensitive information about children, families, or staff, including names, images, or developmental records. It must not be relied upon to make decisions about children's learning, development, behaviour, or wellbeing without the informed professional judgement of an educator. AI is not to replace critical reflection, intentional teaching, or authentic documentation practices, and any content generated must be carefully reviewed to ensure it is accurate, meaningful, and reflective of each child and the service context.

The following principles must always be applied when using any AI tools:

- Data minimisation: use only the minimum information needed to complete the AI task
- Anonymisation: replace identifying details with generic placeholders (e.g. 'a 7-year-old child') before using AI for program planning or case scenario practice
- Purpose limitation: only use AI for the purpose for which the information was originally collected
- Transparency: be aware of the service's privacy policy and ensure it is followed

These boundaries reflect our NQF obligations, child safety duties, and the Office of the Australian Information Commissioner (OAIC) 2024 guidance on AI and privacy.

Child Safety and National Quality Framework (NQF) Obligations

Child safety is the paramount consideration in all aspects of Service delivery, including how AI is used. The NQF embeds the National Principles for Child Safe Organisations across all seven quality areas. The following requirements apply to all staff when using AI tools:

Quality Area 1 — Educational Program and Practice

- AI may be used to support program planning and generating activity ideas; however, all final program decisions must be made by qualified educators who know the children
- Program documentation submitted as NQS evidence must reflect authentic educator practice and must be reviewed, edited, and approved by a human before use
- AI-assisted planning must still be grounded in MTOP outcomes and the observed interests and needs of the children in your service

Quality Area 2 — Children's Health and Safety:

- Never use AI to assess, document, or make decisions about the safety or wellbeing of a child
- Incident, injury, trauma, and illness reports must be completed by a qualified staff member with direct knowledge of the event; AI must not draft or assist in drafting these reports
- Mandatory reporting obligations under state and territory child protection legislation must always be met by a human professional; AI must not be involved in this process

Quality Area 6 — Collaborative Partnerships with Families and Communities:

- AI-generated family communications must be reviewed and personalised to reflect the service's genuine voice and community context before sending
- AI must not be used to draft responses to sensitive family complaints or disclosures; these require a human response

Quality Area 7 — Governance and Leadership:

- WWCC numbers and staff suitability information must never be entered into AI tools
- Decisions about staff fitness to work with children remain entirely the responsibility of the Approved Provider and Nominated Supervisor

Privacy and Confidentiality

OSHC services collect and hold significant volumes of sensitive personal information about children and families. All staff must understand their obligations under the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs) when using AI tools.

All use of AI within the service will prioritise privacy and confidentiality. Personal, sensitive, or identifiable information about children, families, or staff must not be entered into AI platforms under any circumstances. Where AI is used, prompts must be de-identified and general in nature to ensure individuals cannot be recognised.

The OAIC's guidance on commercially available AI products confirms that when staff enter personal information into an AI tool, the service may be considered to have disclosed that information to a third party. Therefore, the Service will ensure all practices align with relevant privacy legislation and internal confidentiality policies, and families will be informed if AI tools contribute to documentation or communication processes.

Educators and other staff must ensure the following information is never entered into any AI tool:

- Children's full names, dates of birth, addresses, or photographs
- Medical diagnoses, health conditions, allergies, or medication details
- Details about a child's additional needs, disability, or support plans
- Court orders, custody arrangements, or authorised nominee restrictions
- Family contact details, emergency contacts, or CCS/CRN information
- Enrolment records or fee account information
- Staff personal information: WWCC numbers, TFNs, performance appraisals
- Any information relating to a child protection concern or mandatory report

Informed Consent

The Service is committed to ensuring informed consent is obtained in relation to the use of AI. Families will be provided with clear and accessible information about how AI may be used within the service, including its purpose and any potential implications for documentation and communication.

Consent will be sought where AI contributes to these processes, and families will have the opportunity to ask questions and make informed decisions. The Service will respect the rights of families to decline or withdraw consent at any time, and this will not impact the quality of care or education provided to their child.

Data Entry

All data entered into AI systems must be carefully considered to ensure privacy, confidentiality, and compliance with service policies and legislation. Educators and staff must only use de-identified, generic information when interacting with AI tools, ensuring that no names, images, addresses, health information, or any other identifiable details about children, families, or staff are included.

Prior to entering any information, staff must assess whether the data could directly or indirectly identify an individual. Only approved AI platforms endorsed by the Approved Provider may be used, and access must occur via secure devices and networks.

Content Generation

To ensure AI tools are used consistently and effectively across our service, when using prompts to generate content, educators will apply the R.A.C.E framework (Role, Action, Context, Execution) to ensure all outputs are appropriate, accurate, and meaningful.

Using the R.A.C.E. framework supports the development of content that reflects how an experienced educator or leader would approach a situation, ensuring responses are thoughtful, contextually appropriate, and grounded in best practice. This approach is essential when the accuracy, quality, and professional integrity of the information are more important than speed, supporting informed decision-making and high-quality outcomes for children.

The RACE framework ensures AI is used as a supportive tool while maintaining educator agency, critical reflection, and accountability. For example:

Step	What to do	OSHC Example
ROLE	Specify the role or perspective from which the AI should respond. By assigning a role, you set the tone and expertise level of the response.	"You are an experienced OSHC Coordinator helping draft family communications."
ACTION	Clearly define the action you want the AI to perform. The action should be a clear directive that guides the AI on what to generate - state the specific task clearly	Draft an end-of-term newsletter for families.
CONTEXT	Context is crucial for AI to generate relevant and insightful responses. Provide necessary background information for AI to understand the task. The more specific and detailed the context, the better the AI can tailor its output to your needs.	Our service runs BSC and ASC at [School Name] for approx. 60 children aged 5–12. It is the end of Term 1 2026. We ran a Harmony Week activity, a cooking program, and have a new outdoor mud kitchen.
EXECUTION	Focuses on how you want the information presented. This can include specifying the format, tone, and length of the output. Whether you need a concise summary, a detailed report, or a persuasive article, clearly stating this in your prompt will guide the AI to deliver exactly what you need.	Warm, inclusive tone. No more than 300 words. Use plain English. Include a section on upcoming holiday care enrolments.

In applying the R.A.C.E framework, educators are encouraged to engage in ongoing iteration, refining prompts and revisiting AI-generated content to improve clarity, relevance, and alignment with the service context. Effective use of AI also supports the reuse of high-quality prompts and outputs, allowing educators to build a consistent and efficient approach to documentation and practice while maintaining critical reflection and professional judgement at all times.

Step	What to do	OSHC Example
ITERATION	Refine and improve the output	Add a short paragraph acknowledging our Aboriginal and Torres Strait Islander families and Country.
SAVE and REUSE	Document effective prompts for the team	Save as 'End-of-Term Newsletter Template' in the team prompt library, tagged: Family Communication, Term 1.

A core element of the R.A.C.E.I.S framework is building organisational knowledge over time. When a prompt consistently produces high-quality, OSHC-appropriate results, it should be saved and shared across the team.

Before writing a new prompt, Educators should check the prompt library for an existing template. Each saved prompt should have a specific tag or name with the: category, AI tool used, date created, and author. Saved prompts should be reviewed at least once per term and updated as the Service needs evolve. Never save prompts that contain identifying information about children, families, or staff.

Validating Content

Validating AI-generated content is a critical step to ensure accuracy, relevance, and appropriateness of information. Educators must critically assess all outputs before use, checking that the information aligns with the child's needs, the service philosophy, and regulatory requirements, including the National Quality Framework and relevant learning frameworks.

Validation involves confirming factual accuracy, ethical suitability, and pedagogical relevance, as well as ensuring that content supports meaningful interactions and authentic documentation. By validating AI-generated content, educators maintain professional responsibility, safeguard children's wellbeing, and ensure that AI is used as a supportive tool rather than a substitute for expert judgement.

Quality Control

AI is a productivity tool, it does not replace the professional judgement, duty of care, or regulatory accountability of Educators and Service Leaders. All staff who use AI remain personally responsible for the accuracy, appropriateness, and quality of any final output.

- All AI-generated content must be reviewed, edited, and approved by a qualified staff member before use
- Documentation submitted as evidence for NQS assessment must reflect genuine, current practice. AI may assist in drafting but must not replace authentic educator reflection.
- The QIP must be a genuine record of the service's self-assessment and improvement goals; AI can assist with formatting and language, but not substance
- AI output must not be submitted as self-authored professional practice evidence for any ACECQA or regulatory authority purpose.

If an AI tool produces inaccurate, biased, or inappropriate output, report it to the Nominated Supervisor for further action where necessary.

Breaches and Compliance

All staff are expected to comply with this policy. Data breaches or concerns must be reported immediately to the Nominated Supervisor in accordance with the service's incident and privacy procedures.

Breaches may include inputting child or family data into AI tools, submitting unreviewed AI content as formal OSHC documentation, or using unapproved AI tools for work purposes.

Consequences may include:

- Mandatory AI literacy training and coaching from the Nominated Supervisor
- Removal of access to approved AI tools
- Formal management process under the Service's HR and disciplinary policy
- Notification to the Approved Provider and, where required, to the Regulatory Authority
- Referral to the OAIC in cases involving a notifiable data breach under the Privacy Act

Where a staff member is unsure whether a particular AI use is appropriate, they should consult the Nominated Supervisor before proceeding. When in doubt, do not use AI.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations**
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- Privacy Act 1988 (Cth)
- Australian Privacy Principles (APPs)
- [Guidance on privacy and the use of commercially available AI products | OAIC](#)

Related policies and procedures

[1.1 Educational Program and Practice](#)

[1.2 Documenting Children's Learning](#)

[1.3 Sharing the Program and Children's Progress with Families](#)

[2.16 Safe Use of Digital Technology and Online environments](#)

[7.6 Privacy and Confidentiality of Records](#)

Policy 1.8 Use of Artificial Intelligence (AI) Technology		
Version and reason for change	Date Implemented	Date of Review
V1-04.2026 – New policy implemented to align service practice with privacy principles		

Policy Group 2

Children's Health and Safety

The health and wellbeing of each OSHC child is **safeguarded and promoted**.

Children enrolled in OSHC have a right to receive high-quality education and care in a setting that **promotes their health and safety**, reinforced by the policies contained in this section. Fundamentally, the service must provide an environment that protects children and ensures they learn in ways that are free from harm or injury.

To enhance the health and safety outcomes of the service, educators will also foster each child's wellbeing, healthy lifestyle choices, and the development of competence, confidence, and independence.

2.1 Providing a Child Safe Environment

Policy Statement

Statement of Commitment to the Safety and Wellbeing of Children

The Service has a firm commitment to the safety, wellbeing and protection of every child. We recognise the paramount importance of an environment where children can grow, learn, and thrive free from harm. As professionals responsible for safeguarding children, we demonstrate leadership and a culture of safety and protection. This is reflected throughout the Service from our philosophy to our day-to-day tasks.

We recognise not only the physical safety of children but also our duty to ensure the psychological safety and wellbeing of children and staff. The Approved Provider will foster an environment of fairness, dignity and respect for all people. The practices endorsed will seek to be inclusive and free from discrimination. Safety and wellbeing will be enhanced by a culture that fosters embedding sound practices, including hazard identification and risk management.

The purpose of this policy is to clearly articulate our comprehensive commitment to child safety and protection, demonstrating the robust systems we have established to coordinate these vital mechanisms. The design of our processes ensures the Approved Provider, Nominated Supervisor, educators and others are aligned in their actions and values to promote the safety and wellbeing of children and young people and uphold the protection of children from harm. The design and development of this and other related child protection policies are informed by:

- the National Principles for Child Safe Organisations,
- The Queensland Government Universal Principle and Child Safe Standards
- The Statement of Shared Commitment and
- Our Child and Youth Risk Management Strategy.

The Approved Provider demonstrates leadership to ensure the promotion of safety and wellbeing of children through establishing effective practices. These being with ensuring the physical environment of The Service addresses relevant hazards via sound and effective risk assessment. As set out in this policy the Service expects the practices carried out to support children's education and care to maintain safety, dignity and rights of each child.

The policy establishes a framework for guidance, instruction and decision-making of educators. As a result, there is a strong expectation for compliance with this policy. The Service will treat any concerns around the performance of safety very seriously.

The Service commitment to promoting safety, wellbeing and protection of children includes its ethical and legal duty to care for children associated with the Service whilst not in the care of their parents/guardians or other caregivers, notifying Child Safety of any reasonable suspicions of significant harm.

Roles and Responsibilities

Approved Provider	• Establish, implement and maintain comprehensive policies, procedures, and management systems to monitor and actively promote the safety and protection of children, in alignment with the Queensland Child Safe Standards. • Implement effective risk management and controls to ensure management systems create a suitable child safe environment. • Ensure suitable persons are recruited, inducted and continually supported to provide care and positive guidance to children, prioritizing their safety and wellbeing. • Provide educators with clear policy and instruction to understand child protection concerns and the actions required as mandatory reporters to notify Child Safety.

Nominated Supervisor	• Monitor and evaluate the effectiveness of risk management systems and practices related to child safety. • Lead the service's culture in the delivery of child safety and wellbeing of children acting as a visible champion for the Queensland Child Safe Standards. • Ensure suitable persons are recruited, inducted and supported to care and positively guide children. • Respond to incidents with timeliness and professionalism always prioritising the child's best interests. • Role model effective safe practices and supervise their consistent implementation by all staff. • Supervise and monitor educator interactions with children and take appropriate action to address these, e.g. reporting to the Approved provider and/or Child Safety. • Serve as the service's key contact for liaising child protection concerns.
All Staff	• Ensure conduct upholds the safety, wellbeing and best interest of children at all times. • Actively supervise and monitor the environment and children's interactions to identify and mitigate potential risks. • Identify and respond to the individual needs of children, including those who may be vulnerable. • Adhere to all practices and expectations for ensuring the safety and wellbeing of children as outlined in this and related policies. • Be fully aware of the service's expectations regarding positive, respectful and appropriate behaviour, and acceptable responses and reactions when working with children. • Immediately identify any inappropriate or unsafe practices and take prompt and appropriate action to address these including reporting to the Nominated Supervisor without delay.

Key Tasks and Responsibilities

Physical Environment	The Approved Provider is to establish and maintain effective risk management and controls to ensure all management systems consistently create and sustain a suitable child safe environment. The Nominated Supervisor will have primary responsibility for continuously monitoring the effectiveness of these systems and practices, ensuring ongoing safety compliance.
Child Safe Practices	The Approved Provider will ensure relevant frameworks (comprehensive policy, clear instruction and ongoing training) ensures educators fully understand and consistently follow their relevant duties and expectations regarding child safe practices. The Nominated Supervisor will be responsible for actively modelling practices and supervising their consistent implementation by all staff. Educators will diligently follow the practices and expectations for ensuring the safety and wellbeing of children, contributing to a collective child-safe culture.
Children in Need of Protection	The Approved Provider will ensure educators have clear, actionable policy and instruction to understand child protections concerns and the actions required as mandatory reporters to notify Child Safety. The Nominated Supervisor will be the service's designated and accessible key contact for liaising on all child protection concerns, ensuring timely and appropriate responses.

Procedures

The Approved Provider, Nominated Supervisor and educators will demonstrate their commitment to providing an environment that is not only safe but also actively promotes the holistic wellbeing of all children at all times through consistently converging procedures and integrated systems of work.

Our Service recognises the Queensland Government Child Safe Standards and Statement of Shared Commitment as frameworks for working with the Regulatory Authority and other child safe organisations to ensure our service is a place where children consistently feel safe, secure, respected and confident to speak up. These practices are incorporated into a variety of interconnected policies as set out below.

A Safe Physical Environment

Risk Assessment Methodology

The Service foundation for a safe and healthy physical environment is informed by best practice guidelines and the specific standards set out in our policy [7.12 Workplace Health and Safety](#), which establishes —

- A risk assessment methodology to systematically identify, assess and control all potential sources of harm and hazards likely to cause injury or compromise child wellbeing.
- Clear routines and practices to monitor the physical environment to ensure it consistently meets documented standards and expectations, such as being safe, clean, in good repair and developmentally appropriate, to ensure safety.
- Routines and practices actively embedded by staff to encourage, role-model and support children's learning of protective behaviours and personal safety skills, empowering them to identify and respond to unsafe situations.
- Regular communication of relevant risk management plans and activities to parents/guardians, staff and the wider school community annually through various channels including displays, newsletters, training sessions and meetings, fostering a shared responsibility (refer policy [6.5 Interactions and Communication with Families](#)).

Service Outdoor Environment

Risk management practices are adopted in situations where dogs and/or other unidentified animals (e.g. snakes) may be present within the Service's outdoor environment, prioritising immediate child safety. Educators will immediately remove children from the area as per emergency procedures in policy [2.13 Emergency Evacuation, Lockdown and Drills](#), then safely isolate and secure the animal away from the area.

In the event of an animal attack on a child or adult, procedures as per policy [2.4 Incident, Injury, Trauma and Illness](#) will be followed which may include contacting emergency services 000 for assistance and activating the emergency procedures as per policy [2.13 Emergency Evacuation, Lockdown and Drills](#).

External Environments

Complementary and comprehensive risk assessment practices are adopted in situations where the Service operates outside the premises, ensuring child safety extends beyond the primary site. These procedures are set out in policies [1.4 Excursions, Incursions and Regular Outings](#), and where relevant policy [2.6 Water Safety](#) and address--:

- The relevant and specific risks in any public environment accessed by the Service, including detailed pre-excursion risk assessments,
- Ensuring parents/guardians have full access to all necessary information for informed consent regarding their children's participation, including details of supervision and safety measures.

Reducing Exposure to Hazards

Clear and actionable procedures to address specific hazards are set out in the following policies, demonstrating a proactive approach to child safety —

- For emergency situations, the planning and regular rehearsal for steps to rapidly and safely assemble in a designated safe location is set out in policy [2.13 Emergency Evacuation, Lockdown and Drills](#), ensuring all staff and children are prepared
- To ensure children have access to facilities to treat any injuries as addressed in procedures set out in policy [2.4 Incident, Injury, Trauma and Illness](#) and [2.5 Administration of First Aid](#), ensuring prompt and appropriate medical attention.
- Illness, disease and infection risks are primarily set out in policy [2.7 Infectious Diseases](#), which establishes protocols for limiting exposure as a primary intervention, complemented by health and hygiene practices to protect children's health.
- Setting up an environment to reduce exposure to UV hazards is set out in policy [2.11 Sun Safety](#), promoting skin protection and safe outdoor play.

- Ensuring there is a safe and suitable eating environment; steps to address associated hazards are set out in policies [1.6 Food and Nutrition](#) and [2.12 Safe Food Handling, Preparation and Storage \(Food Safety Program\)](#), prioritising children's health and preventing allergic reactions or foodborne illnesses.

Practices to Promote Children's Safety and Wellbeing

The practices of the Service are the operationalised reflection of our service's commitment to a culture of child safety and holistic wellbeing embedded in every interaction and decision. These practices include—

Employment and Induction

A careful and considered approach is taken to attract, screen and select only the most appropriate people to interact and care for the children of our service, ensuring their suitability and commitment to child safety. This includes—

- Interview protocols that thoroughly assess the candidate's merit for the position, including demonstrable evidence they possess the suitable knowledge, skills and ability to meet the Service's child safety requirements.
- All judgements and decision-making for selection and recruitment are transparent, free from bias and undue influence, and strictly adhere to the service's Code of Conduct, ensuring fairness and integrity.
- All employees must comply with blue card (Working with Children Check) requirements, including holding a valid positive notice, that is linked to the Approved Provider, prior to commencement of any work with children.
- All employees must provide evidence of successful completion of approved child protection and child safety training

Once offered employment, staff members are thoroughly and comprehensively inducted to ensure they have a sound understanding of the key requirements to appropriately and safely work with children and diligently discharge their responsibilities with child safety as a core component. The induction material and processes are designed to verify the staff member's understanding and ability as being suitable and appropriate to provide quality education and care with a strong emphasis on child protection (refer policies [4.1 Recruitment and Employment of Educators](#), [4.5 Volunteers and Students](#) and [7.2 Determining the Responsible Person](#)). Induction processes will also include guidance and training related to cultural safety and strategies for creating an inclusive environment.

The Service will establish ongoing procedures for the systematic management, screening and continuous monitoring of Blue Card (Working with Children Check) compliance for all relevant persons (see policies [4.3 Working with Children Checks and Management](#) and [4.5 Volunteers and Students](#)).

Staffing Arrangements

A roster and coordination of duties is coordinated to ensure the regulatory requirements for ratios, qualifications, leadership and supervision are consistently met. Educators are never left alone at the Service, with a strict requirement of at least two staff members being present at all times the service operates enhancing supervision and safety.

Leadership and Management forms a key and integral element of the staffing arrangement mix, ensuring strong oversight of child safety. People with management and control of the Service are assessed as fit and proper for the role demonstrating their suitability and commitment to child protection, as set out in policy [7.5 Governance and Management](#). Likewise, where the Nominated Supervisor is not present at the service, a suitable Responsible Person is appointed. The assessment of the suitability of the Responsible Person is set out in policy [7.2 Determining the Responsible Person](#).

Supervision and Duty of Care

Effective supervision practices play a pivotal and indispensable role in ensuring children are safe, continuously observed, and meaningfully engaged, thus actively preventing incidents, injuries, and potential harm, refer policy [2.2 Supervision and Educator Ratios](#). Effective supervision is ensured by—

- Coordinating staffing arrangements to maximise resources, including the careful consideration of each educator's skill, knowledge and capacity to provide optimal supervision.

- Providing clear actionable instructions to ensure educators are vigilantly monitoring children's activities, interactions, and environments, and are responding promptly to any potential risks or concerns.
- Establishing clear protocols and monitoring mechanisms around supporting children where privacy and dignity are important considerations (refer policy [3.4 Children's Toileting](#)) and ensuring facilities support appropriate boundaries (staffing toilets), respecting children's rights.
- Through consideration of the relevant risks and hazards associated with activities, including the specific needs of children who are or may participate, ensuring inclusive safety planning.
- Implementing risk assessments and clear procedures to manage their travel, arrival and collection as set out in policy [2.3 Safe Arrivals and Departures of Children](#), ensuring children's safety during transitions
- Ensuring educators are fully aware of children's individual medical and health needs with planned and informed practices for their care are set out in policy [2.9 Medical Conditions in Children](#), prioritising their health and safety.
- Implementing a planned and coordinated approach for the prompt and effective response to incident and injuries is set out in policy [2.4 Incident, Injury, Trauma and Illness](#), ensuring immediate action and appropriate follow-up.
- Risk assessments and supervision plans will consider how children's cultural practices and religious beliefs are supported safely and with respect.

Professionalism and Conduct

The Service has firm and comprehensive procedures to ensure interactions and relationships with children are consistently supportive, positive, and respectful including the practices to guide behaviour via positive guidance and trauma-informed approaches. Children are to be cared for in an environment that consistently demonstrates respect, upholds dignity and actively promotes a child's self-regard and agency, as set out in policies [5.1 Interactions and Relationships with Children](#), [5.2 Positive Behaviour Support Practices](#) and [5.3 Supporting Complex Behaviours](#). These practices also consider the role of psychological and cultural safety to reflect our core values of wellbeing, inclusion and a child-centred approach.

All educators are required to participate in ongoing professional development focused on cultural competency and supporting the diverse identities of children and their families. This includes training on the appropriate and respectful use of cultural resources and materials.

All persons positioned to interact and build relationships with children have clear guidelines for their behaviour (refer policy [4.6 Code of Conduct](#)), with all staff actively supervised to ensure their actions are consistently aligned with the Service's Code of Conduct and the Queensland Child Safe Standards.

Collaboration and Transparency

Parents/guardians remain well informed and actively engaged regarding potential hazards and relevant risk management plans, with their informed consent required for participation in the Service as set out in policy [6.4 Acceptance and Refusal of Authorisations](#), fostering a partnership approach to safety.

The Service also has established requirements and clear expectations for children and young people's participation and attendance at the service, promoting a safe and inclusive environment for all. Should any child compromise the safety and wellbeing of others, formal mechanisms allow for review of additional support and/or enrolment as set out in policy [6.2 Enrolment and Orientation](#), always prioritising the safety of the wider group.

The Service will actively seek and incorporate feedback from children and families from diverse cultural backgrounds to inform and improve our practices and policies related to cultural safety.

Likewise, formal, accessible and confidential mechanisms are established to actively encourage children and families to speak up about any concerns or discomforts they may have through policies [6.7 Feedback and Complaints Handling](#) and [2.14 Child Protection and Mandatory Reporting](#), which ensure families are not exposed to retribution or victimisation as a result of having concerns raised.

The service has procedures in place to ensure the written permission of parents/guardians for children to be photographed at the service is obtained, respecting privacy and consent. Photographs will be for service use only (see policies [6.2 Enrolment and Orientation](#) and [4.6 Code of Conduct](#)).

Identifying Children in Need of Protection

Providing suitable ongoing and practical training and instruction for all staff on their duty as Mandatory Reporters to accurately identify and appropriately respond to allegations or suspicion of harm and abuse (see [2.14 Child Protection and Mandatory Reporting](#)), ensuring they are equipped to act.

Promptly reporting incidents and relevant notifications to the Approved Provider and communicating this to the Regulatory Authority as outlined in policies [2.4 Incident, Injury, Trauma and Illness](#) and [7.7 Managing Notifications](#), ensuring timely and transparent reporting.

Online Environments

To ensure children at the service are provided with a safe environment at all times, including online environments, the service has set out relevant and comprehensive procedures in [2.16 Safe Use of Digital Technologies and Online Environments](#), addressing the evolving landscape of child safety.

Written authorisation is requested as part of the enrolment process for children to use computers/tablets and to have their photo taken and published as part of promotional marketing or on the app program used by the service, ensuring informed consent. The identity of a child is not published on any platform, protecting their privacy.

Personal mobile phones are strictly prohibited for taking photos or videos of children at the Service. Only educational software programs and apps that have appropriate content and have been examined and approved prior to allowing their use in the Service. Children are always actively supervised when using any technology and prompt action is taken should something inappropriate be viewed, ensuring a secure digital environment.

This policy and its procedures, outlining the service's commitment to the safety and wellbeing of children and the protection of children from all forms of harm, will be reviewed **annually** or as required, with a specific focus on continuous alignment with the Queensland Child Safe Standards and evolving best practices.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.165 Offence to inadequately supervise children
 - s.162A Child Protection training
 - s.162B Child Safety training
 - s.166 Offence to use inappropriate discipline
 - s.166A Offences relating to Inappropriate conduct
 - s.167 Offence relating to protection of children from harm and hazards
 - s.170 Offence relating to unauthorised persons on education and care service premises
 - s.171 Offence relating to direction to exclude inappropriate persons from education and care service premises
 - s.173 Offence to fail to notify certain circumstances to Regulatory Authority
 - s.174 Offence to fail to notify certain information to Regulatory Authority
- **Education and Care Services National Regulations:**
 - R.12 Meaning of serious incident
 - R.82 Environment to be free from tobacco, vaping devices, vaping substances, drugs and alcohol
 - R.83 Staff members educators not to be affected by alcohol or drugs
 - R.84 Awareness of child protection law
 - R.85 Incident, injury, trauma and illness policies and procedures
 - R.86 Notification to parents of incident, injury, trauma and illness
 - R.87 Incident, injury, trauma and illness record

- R.88 Infectious diseases
- R.89 First aid kits
- R.90 Medical conditions policy
- R.91 Medical conditions policy to be provided to parents
- R.92 Medication record
- R.93 Administration of medication
- R.94 Exception to authorisation requirement—anaphylaxis or asthma
- R.95 Procedure for administration of medication
- R.96 Self-administration of medication
- R.97 Emergency and evacuation procedures
- R.98 Telephone or other communication equipment
- R.99 Children leaving the education and care service premises
- R.103 Premises, furniture, and equipment to be safe, clean and in good repair
- R.115 Premises designed to facilitate supervision
- R.122 Educators must be working directly with children to be included in ratios
- R.123 Educator to child ratios – centre-based services
- R.128B Child protection training
- R.128D Foundation child safety training
- R.128E Advanced child safety training
- R.136 First aid qualifications
- R.168 Education and care services must have policies and procedures
- R.170 Policies and procedures to be followed
- R.171 Policies and procedures to be kept available
- R.172 Notification of change to policies or procedures
- R.175 Prescribed information to be notified to Regulatory Authority
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety
 - QA3 – Physical environment
 - QA4 – Staffing arrangements
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership.

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Child Protection Act 1999 \(Qld\)](#)
- Department of Education - [Child Care Provider Handbook](#)
- Council of Australian Governments - [National Principles for Child Safe Organisations](#)
- [United Nations Convention on the Rights of the Child](#)
- ACECQA - [Factors to consider when planning for adequate supervision](#)
- ACECQA – [Active Supervision: Ensuring safety and promoting learning](#)
- Department of Children, Youth Justice and Multicultural Affairs - [Information sheet 1 – Mandatory reporting by early childhood education and care professionals](#)
- ACECQA - [Providing A Child Safe Environment Policy Guidelines](#)
- Queensland Government [Statement of Shared Commitment](#)
- [National Principles | Child Safe Organisations](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related policies and procedures

- [1.1 Educational Program Development and Implementation](#)
- [1.5 Sleep, Rest and Relaxation](#)
- [1.6 Food and Nutrition](#)
- [1.7 Screen-Time and Media Viewing](#)
- [2.2 Supervision and Educator Ratios](#)
- [2.3 Safe Arrivals and Departures of Children](#)
- [2.4 Incident, Injury, Trauma and Illness](#)

[2.5 Administration of First Aid](#)
[2.6 Water Safety](#)
[2.7 Infectious Diseases](#)
[2.8 Hygiene, Health and Wellbeing Practices](#)
[2.9 Medical Conditions in Children](#)
[2.10 Administration of Medication](#)
[2.11 Sun Safety](#)
[2.12 Safe Food Handling, Preparation and Storage \(Food Safety Program\)](#)
[2.13 Emergency Evacuation, Lockdown and Drills](#)
[2.14 Child Protection and Mandatory Reporting](#)
[2.16 Safe Use of Digital Technologies and Online Environments](#)
[2.17 Child Safety and Wellbeing](#)
[3.1 Space and Facilities Requirements](#)
[3.3 Smoking, Drugs and Alcohol-free Environment](#)
[3.4 Children's Toileting](#)
[3.5 Emergency and Safety Equipment](#)
[4.1 Recruitment and Employment of Educators](#)
[4.3 Working with Children Checks and Management](#)
[4.5 Volunteers and Students](#)
[4.6 Code of Conduct](#)
[4.9 Fitness for Work](#)
[5.1 Interactions and Relationships with Children](#)
[5.2 Positive Behaviour Support Practices](#)
[5.3 Supporting Complex Behaviours](#)
[5.5 Promoting Protective Behaviours](#)
[6.2 Enrolment and Orientation](#)
[6.4 Acceptance and Refusal of Authorisations](#)
[6.5 Interactions and Communication with Families](#)
[6.7 Feedback and Complaints Handling](#)
[6.9 Childhood Immunisation](#)
[6.11 Cultural Safety](#)
[7.1 Nominated Supervisor](#)
[7.2 Determining the Responsible Person](#)
[7.4 Leading Compliance and Quality Assurance](#)
[7.5 Governance and Management](#)
[7.7 Managing Notifications](#)
[7.12 Workplace Health and Safety](#)

Policy 2.1 Providing a Child Safe Environment		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Address regulatory changes		
V1-06.2024 – no updates		
V2-03.2025 – Added information for all roles and responsibilities, additional procedures relevant to the service outdoor environment, online environments for children and unidentified animals in the outdoor environment, added reference to Statement of Shared commitment.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced key tasks and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V4-04.2026 – added information relevant to child protection and child safety training, added references to National Law and Regulations		

2.2 Supervision and Educator Ratios

Policy Statement

The Service is dedicated to maintaining the highest standards of child safety and wellbeing for all children in our care. This commitment is underpinned by our adherence to the *Education and Care Services National Law and Regulations*, *Queensland Child Safe Standards and Universal Principle* and the *National Principles for Child Safe Organisations* and embedded in practices related to staffing, supervision, and risk management.

The Service understands that adequate staffing and appropriate educator-to-child ratios are fundamental to ensuring child safety and effective supervision. Therefore sound planning a commitment to quality rostering ensures that educator-to-child ratios are consistently maintained. Consideration is continually given to the nature of activities undertaken, the ages and abilities of the children and any special needs that the children may have as well as the ongoing obligation to ensure effective supervision.

The Service acknowledges that effective supervision is paramount to ensure the safety and wellbeing of all children is upheld. All educators are expected to take a proactive approach to ensure the adequate and appropriate observation of children whilst participating in the service's program, knowing and accounting for the activity and whereabouts of each child in care and the proximity of educators to children at all times to safeguard a child from risk of harm.

Definitions:

'Supervision of children': Knowing and accounting for, the activity and whereabouts of each child in care and the proximity of educators to children at all times to ensure the immediate intervention of educators to safeguard a child from risk of harm

Roles and Responsibilities

Approved Provider	• Ensure that the premises and facilities are designed and maintained to facilitate adequate supervision of children at all times while maintaining the rights and dignity of all children • Ensure practices and budgets reflect quality care and sufficient staffing arrangement to cater for the needs of children. • Establish and ensure effective practices and expectation to support the supervision of children.
Nominated Supervisor	• Develop rosters and staffing plans to ensure regulations are consistently maintained at all times. • Ensure staffing arrangements include contingency planning to ensure ratios are consistent with Regulations and risk-assessments • Lead risk assessment planning to identify suitable staffing ratios for high-risk activities. • Develop comprehensive supervision plans and strategies for both indoor and outdoor environment • Monitor and support educators practices and capacity to adequately supervise children. • Ensure educators are adequately instructed, trained and supervised to meet the needs of children. • Support the response to incidents and children's behaviour, including debriefing and supporting ongoing learning of educator's supervision skills of educators • Create opportunities for collaboration with other Educators to ensure the safety and wellbeing of children. • Ensure flexibility of supervision to allow educators to supervise individual children or small groups. • Ensure educators are aware that if they need to move away from children, another educator must replace them

All Staff	• Support rostering development through effective communication of absences and unavailability. • Have a sound understanding of their duty of care and responsibilities in ensuring a safe environment for children. • Communicate and collaborate with others for effective supervision of children • Adhere to supervision plans and strategies for both indoor and outdoor environments • Implement the service's recommended skills and practices to meet supervision expectations. • Respect children's age, developing independence and need for privacy when providing supervision. • Ensure all children are in sight or hearing of educators at all times • Not perform other duties while responsible for the supervision of children • Communicate concerns to the Nominated Supervisor, Responsible Person, or another relevant delegate. • Regularly reflect on own practices and participate in the development and improvement of a safeguarding culture at the Service.

Procedures

Supervision of Children

The Service is committed to upholding the rights of the child and ensuring the effective supervision, safety and wellbeing of all children and educators through the following:

- Rostering practices that are designed to:
 - Ensure there will be at least two educators at all times on the premises whilst children are in care, with one designated as a Responsible Person for the service.
 - Only educators directly working with children are included in calculating ratios.
- When planning activities and determining the necessary supervision requirements, the Nominated Supervisor /Responsible Person in charge will ensure consideration is given to the design and arrangement of the indoor and outdoor environment to ensure it supports active supervision by educators. This proactive approach minimises risk and enhances child safety, a core component of the child safe practices.

Supervision is provided by OSHC educators during the service operating hours and once children are signed into the program. If children are signed out of the program and remain on the premises, the parent/guardian is responsible for them however, if the child is observed displaying inappropriate behaviour an educator may still apply the service behaviour management guidelines, demonstrating our ongoing duty of care for child wellbeing.

Any other children who may be on site with a parent, but not signed in to the Service, will be the responsibility of the parent who will be accountable for any incidents or accidents that may occur to their child or any child who is signed in and attending the Service.

Educators will be required to do regular head counts and use service walkie talkies when supervising activities outside or away from the OSHC indoor area. A head count will occur when all children return to the OSHC room. Where there is a discrepancy or incident with a child's whereabouts the procedures outlined in policies [2.3 Safe Arrivals and Departures of Children](#) and/or [2.4 Incident, Injury, Trauma and Illness](#) will be followed. This system ensures constant awareness of children's whereabouts.

Educators will use walkie talkies to report and respond to all movements of children. Children's movements will be supervised by educators at all times. Personal mobile phones are strictly not to be used by educators when supervising children however, in extenuating circumstances and with the prior consent of the Nominated Supervisor, personal mobile phone usage may be permitted.

The Nominated Supervisor will be made aware of children involved in behaviour incidents who may require further support. Children will be directed to a quiet area and supervised by the Nominated supervisor (or

other educator) until such time as they are ready to re-join the activity. This child-focused approach supports their emotional wellbeing and re-engagement.

Educators will not undertake secondary activities such as mobile phone calls or completing paperwork when supervision is being undertaken. Undivided attention is fundamental to ensuring child safety.

Escorting children to/from school

Preps

Educators escorting Preps to class in the morning after signing out from OSHC will be required to sign the children into their respective classes on the forms provided by the school (term 1), or wait until the teacher welcomes children into their classroom (beyond term 1).

Educators collecting preps from their classrooms will be required to inform the teacher of which children they are taking from their classrooms prior to signing them into OSHC.

Grade One

Educators escorting Grade Ones to class in the morning after signing out from OSHC will be required to supervise the children until they are safely in their classrooms.

In Term 4, children may walk to and from their classrooms unaccompanied by Educators, this is only with written parent/guardian permission, which will be provided at the beginning of Term 4.

Educators collecting Grade Ones from their classrooms will be required to inform the teacher of which children they are taking from their classroom where possible prior to signing into OSHC.

Supervision of play areas

Educators shall at all times position themselves to be able to observe the activities and actions of each child. Educators will actively listen to the children during all activities for indicators that the situation is out of the ordinary (e.g. crying, choking or gasping, offensive or aggressive language or silence). Educators will listen to the environment in general and act on any sound heard that may indicate an increased risk to the children (e.g. thunder). This constant, active vigilance is central to our commitment to child safety.

Educators will provide direct, constant and proximal monitoring to children undertaking activities that involve some risk. The number of supervising educators for activities will be determined through the completion of risk assessments and will be based on the:

- type of activity (e.g., excursion, swimming); and
- age and capabilities of the children undertaking the activity; and
- area the activity will be conducted; and
- age and skill of educators supervising

Children who would like to leave their current area and go to a new one, must inform an educator in that area BEFORE moving to the new area. The educator will use the walkie talkie to inform other educators which child/ren will be moving to their area. All communications must be acknowledged. This clear communication protocol enhances the supervision and safety of children across all areas of the service.

Supervision of Children's Toileting

Refer specific procedures as set out in policy [3.4 Children's Toileting](#)

All children will be actively supervised whilst accessing the toilet facilities. Children will be required to inform an educator when they need to access the toilet. Educators shall use service walkie talkies to monitor children accessing the toilets. This balances a child's right to privacy with their safety and wellbeing.

Children using the oval and requiring the toilet, will seek permission from an educator who will use the walkie talkie to inform educators in the OSHC room which child/ren will be coming up to use the bathrooms. The OSHC room educator will acknowledge and actively watch for the child/ren and use the walkie talkie to inform the oval educators when the child/ren will be returning. All communications must be acknowledged. This ensures continuous awareness of a child's location and safe transitions.

Educator Ratio Requirements

In setting educator to child ratios, management will be guided by the Education and Care Services National Regulations 2011, which set out the following:

- A maximum of 15 school-age children to 1 educator (Regulation 123 (1)(d));
- Educators must be working directly with children to be included in the ratios (Regulation 13 & 122); and
- At least one educator, with first aid qualifications, anaphylaxis management training, and emergency asthma management training will be in attendance and immediately available in an emergency (Regulation 136).

Children who may require additional support, assistance or attention are considered. This may include extra educators in accordance with funding and support arrangements for that child. This individualised approach demonstrates our commitment to meeting the diverse needs of all children and upholding their right to safety and support.

Composition of Qualified Staff

Minimum qualification requirements must be applied when calculating ratios (Regulation 299)

- One person with a 2-year qualification (Diploma level) will be present at all times that education and care is being provided. During vacation care, the 2-year qualified person needs to be present for a minimum of 7 hours and 15 minutes.
- Thereafter, for every 30 children in attendance, one educator with a 1-year qualification (Certificate III level) will be present.
- Aside from the above, educators in ratio under 18 years of age must be working towards an approved qualification

Educators under eighteen years of age who are supervising children will be fully supervised by a qualified educator who is eighteen years or over. This ensures that all supervision is provided by competent and experienced staff.

Volunteers

Volunteer workers are not counted towards the educator to child ratios for the service and will be fully supervised by an Educator. Volunteers under the age of 18 must be fully supervised. Risk assessments will be conducted, as necessary when utilising volunteers.

All volunteer over 18 years old must comply with volunteer blue card requirements, including holding a positive notice, that is linked to the Approved Provider, prior to commencement. Our approach to volunteers prioritises child safety through stringent oversight and risk management.

Excursions and Special Activities

For excursions or activities that pose an additional risk, educator to child ratios will be determined once a full risk assessment of the activity has been conducted. When setting ratios consideration will be given to the level of risk and hazards identified, the nature of the activities, transportation, and any other relevant matters (Regulation 101(f)). This comprehensive risk assessment process is a fundamental element of our child safe environment.

The Service will ensure to keep within the educator ratios of:

- A maximum of 10 school-age children to 1 educator while on excursions,
- A maximum of 7 school-age children to 1 educator while swimming.

Educator Guidance and Training

All staff will maintain an active watch on the environment under their supervision. Educators will be provided with regular and consistent information and instruction regarding the following effective supervision skills:

- Scanning
 - Regularly looking around (and beyond the immediate area) to observe all the children in the vicinity.
 - Will aim to be standing while supervising the children – it is more effective to supervise while standing and continuously moving and pacing around. Educators may be required to bend down or sit down to interact with child/ren. If an educator is required to sit, they will position themselves in a way that they are able to oversee the area. An educator may call for an additional educator for support if they have identified that they are not able to effectively scan the area whilst they bend/sit with child/ren
 - Be aware of every adult that arrives to collect a child, including parents, relatives or friends they have not seen before, as well as any people involved in specific court-order or special pick-up arrangements. This vigilance is critical for protecting children from harm.
- Positioning and Proximity
 - Being strategically positioned in order to best observe and/or interact with children.
 - Position yourself to supervise as many children as possible, and stand in relation to the children, other staff-members, and the geographical area you are responsible for supervising, for example, situate yourself near the entrances and exits of an area to see children move in and out, make sure your line of vision is clear, and avoid standing too close to other staff-members unnecessarily.
- Listening
 - Assists child/ren in using additional sensory resources and/or strategies in response to signals that a child/ren may require added support or attention.
- Diligence and engagement
 - being aware of children, their traits, moods, and characteristics to anticipate and promptly respond to children's needs, skills and capabilities.
 - Only participate in any activities in so far that it does not distract from supervision or behaviour management of children.
 - Avoid engaging in unnecessary and non-work-related conversation with co-workers.
 - Minimize children's interactions with other children not attending the Service, and if necessary, ask other children to move away. These practices ensure children receive undivided attention and protection.
- Coordination and teamwork
 - communicating with others to align supervision activities.
 - Use the walkie-talkie to communicate with the Nominated Supervisor/Responsible Person to ensure adequate identification is provided and checked before releasing children into the care of other adults. Effective teamwork is integral to a strong child safe culture.

Starting from orientation and induction and ongoing through regular team meetings and conversations, educators will be given guidance and instruction regarding effective supervision of all children participating in their area/activity (including but not limited to):

- when setting up the environment and/or activities,
- the use of various staff communication methods (e.g., use of walkie talkie),
- being made aware of the procedures for:
 - children accessing the toilet,
 - children's individual health and or medical needs and any relevant emergency management plans,
 - any identified hazards and/or risks to children and the control measures in place. This proactive sharing of information is vital for maintaining a safe environment.
- being made aware of the children in care, the group dynamics and behaviour strategies that may be useful, and
- being made aware of any children in care with special/additional needs.

All educators will be advised of the expectation that the Nominated Supervisor will be made aware of children involved in any incidents who may require further support, consistent with policy [2.4 Incident, Injury, Trauma and Illness](#). This ensures that every child's safety and wellbeing are consistently monitored and supported, aligning with the child-focused principles of the Queensland Child Safe Standards.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.165 Offence to inadequately supervise children
 - s.167 Offence relating to protection of children from harm and hazards
 - s.174 Offence to fail to notify certain information to Regulatory Authority
- **Education and Care Services National Regulations:**
 - R.13 Meaning of working directly with children
 - R.115 Premises designed to facilitate supervision
 - R.122 Educators must be working directly with children to be included in ratios
 - R.123 Educator to child ratios—centre-based services
 - R.136 First aid qualifications
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.176 Timeframes for notifying certain information to the Regulatory Authority
 - R.299 General qualification requirements for educators—children over preschool age
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety
 - QA4 – Staffing arrangements
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Child Protection Act 1999 \(Qld\)](#)
- Queensland Government [Statement of Shared Commitment](#)
- [National Principles | Child Safe Organisations](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[1.1 Educational Program Development and Implementation](#)

[2.1 Providing a Child Safe Environment](#)

[2.3 Safe Arrivals and Departures of Children](#)

[2.6 Water Safety](#)

[2.13 Emergency Evacuation, Lockdown and Drills](#)

[2.14 Child Protection and Mandatory Reporting](#)

[2.17 Child Safety and Wellbeing](#)

[3.4 Children's Toileting](#)

[4.5 Volunteers and Students](#)

[4.6 Code of Conduct](#)

[7.1 Nominated Supervisor](#)

[7.4 Leading Compliance and Quality Assurance](#)

Policy 2.2 Supervision and Educator Ratios		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – no updates		
V2-06.2025 – Added definitions in policy statement, information for all roles and responsibilities, additional procedures relevant to supervision of play areas and educator guidance with supervision, added reference to Statement of Shared commitment.		

V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

2.3 Safe Arrivals and Departures of Children

Policy Statement

The Service is committed to ensuring the safety, protection and well-being of every child in our care, with particular attention to the high-risk transition times of arrival and departure. Guided by the *Education and Care National Law and Regulations* and the *Queensland Child Safe Standards*, we actively embed child-safe practices into all daily operations, decision making, and interactions to create a safe, consistent and inclusive environment for children, families, and staff.

The purpose of this policy is to uphold the safety, protection, and wellbeing of every child in our care by establishing clear, child-safe procedures for:

- Ensuring children arrive at the service safely and are accounted for whenever they are booked into care,
- Managing children's safe travel during transitions between school and OSHC at the beginning and end of the school day,
- Facilitating safe departure from the service to extracurricular activities or home with a parent/guardian or authorised person.

This policy serves as a collaborative framework for staff, parents/guardians, and authorised nominees to prioritise child safety through clear communication consistent practice, and shared responsibility. It encompasses procedures for—

- Confirming and communicating children's anticipated attendance in advance,
- Accurately recording arrival and departure times (as a legal safeguard),
- Verifying the identity of every person collecting a child,
- Managing arrivals and departures linked to extra-curricular activities with documented consent,
- Responding to any incidents or emergencies relating to a child's movements or whereabouts.

Our procedures for the safe arrival and departure of children are developed using a comprehensive child-safety risk-assessment approach. This ensures clear guidelines, responsibilities, and protocols are in place to manage transition periods effectively so that:

- No child is ever unaccounted for,
- No child is left unsupervised at any time
- No child is collected by an unauthorised or unknown person.

The Service is structured to meet the needs of families, allowing for children to arrive or be collected from the service anytime within their booked sessions of care:

Before School Care	6:30am – 8:55am	After School Care	3:00pm – 6:00pm
Vacation Care	7:00am – 6:00pm	Pupil Free Days	7:00am – 6:00pm

Given the unique nature of the transitions from a school environment, especially children's movement between classrooms and an After School Care (ASC) session, the Service has designed specific procedures to minimise communication barriers to ensure parents/guardians can efficiently communicate absences, . Understanding which children are expected to attend prior to an ASC session is paramount for effective planning, maximum supervision and a proactive approach to child safety.

Incident Management

In the event of unexpected occurrences or incidents, the Service has clear plans and procedures to respond in a timely and collaborative manner, upholding the paramount principle of child safety and wellbeing. Our response prioritises the child's immediate needs and long-term well-being above all else.

Roles and Responsibilities

Approved Provider	• Take reasonable steps to ensure all staff, educators, visitors, families, children adhere to this policy and related procedure, fostering a culture of child safety and accountability. • Conduct comprehensive risk assessments to identify and mitigate any risks or hazards to children's health, safety or wellbeing during travel between our OSHC service and an educational facility • Ensure appropriate educator/child ratios are maintained and adequate supervision is provided during all arrival and departure periods. • Ensure copies of the policy and procedures are readily available and accessible to educators, staff and families, promoting transparency and shared responsibility for child safety. • Ensure employees are provided with clear procedures and support to account for care and respond to children's attendance, collection and departure, empowering staff with the knowledge to protect children. • Ensure accurate attendance records are maintained, ensuring accountability and monitoring of children's whereabouts. • Provide relevant notifications to the Regulatory Authority, as required.
Nominated Supervisor/Responsible Person in Charge	• Ensure all educators and staff are thoroughly inducted in the <i>Safe Arrival and Departure of Children</i> policy and procedure, building a strong foundation of child safety knowledge. • Prioritise safeguarding children and promptly notify/report any inappropriate interactions involving a child or children attending the Service. • Responsible for ensuring children are accounted for, collected and depart as parents/guardians parents have expressed in writing or in response to an emergency, maintaining strict adherence to authorisation protocols. • Maintain accurate records detailing any persons dropping off and collecting children. • Ensures children only leave the education and care premises in the care of a parent /guardian or authorised person or in accordance with written authorisation as per Regulation 99. • Provide Educators and staff with clear procedures and comprehensive training on how to verify the identity of an authorised nominee or a person authorised by the parent or authorised nominee to collect the child, including protocols for responding to attempts by unauthorised persons to collect a child. • Collaborate effectively with the school community to respond to children who are not accounted for in a timely manner, demonstrating a proactive and collaborative approach to child safety. • Develop and maintain open communication channels and strategies between families, our service, educators and the educational facility. • Ensure the service keeps accurate attendance records recording the following: • time and date children arrive or depart the OSHC service • signature of the person who has collected or delivered the child to the service or the signature of the Nominated Supervisor or educator in accordance with this policy and procedure • Respond and lead critical incidents, liaising with police as required to ensure child safety • Ensure relevant notifications are provided to the Regulatory Authority, as required.

All Staff	• Provide quality supervision and support to children, responding to their needs to ensure they feel secure and comfortable at the service, fostering a child-centred environment. • Respond to critical incidents in a timely manner, providing clear and concise information to the Nominated Supervisor for response and management. • Be accountable and take immediate action to protect children whenever harmful interactions are observed, demonstrating a proactive commitment to child protection. • Ensure children depart the service in the care of a parent, an authorised nominee named in the child's enrolment form or a person authorised by the parent or authorised nominee; or given into the care of a person in accordance with the written authorisation of the child's parent or authorised nominee, upholding strict safety protocols at all times.
Families	• Inform the OSHC service of any change in attendance or routine that may affect the child's safe arrival or departure as soon as they are aware. • Notify the OSHC Service if their child is going to be absent on a particular day or session, assisting with accurate record-keeping and proactive safety measures.

Key Tasks and Responsibilities

Risk Assessment and Developing Procedures	The Approved Provider is responsible for ensuring a comprehensive risk assessment has been carried out to ensure the safe travel of children to and from the service (to school). The Nominated Supervisor is responsible for supervising the effectiveness of the risk assessment and corresponding procedures, ensuring continuous improvement in child safety measures.
Supervising Arrivals and Departures	The Nominated Supervisor or Responsible Person will lead the procedure for ensuring all children have presented or departed as planned and will phone parents/guardians to confirm absences or initiate emergency procedures, prioritising the immediate safety of the child and taking swift action when necessary.
Signing Children in	Educators asked to support the arrival procedures will greet children as they enter the service (or collect them from classrooms), marking their arrival to ensure all children are accounted for.

Procedures

Administration of Attendance Records

The Service utilises child care software and iPads to accurately record children's attendance ([Regulation 158](#)) and manage bookings. Parents/guardians and/or the person collecting or delivering the child to the Service must complete the sign-in or out procedures.

****Accurate attendance records are a legal requirement for claiming Child Care Subsidy and there are strict guidelines regarding signing children in and out of care. All persons authorised to collect children (parent/guardians and other people they give permission for) are issued with a PIN which is to be kept confidential and not shared with other non-authorised people. At the child's next attendance, the parent/guardian will be required to electronically authorise any other person who has collected the child, even if they are already an authorised person.**

Arrivals and Departures – Signing In and Out Process

A parent/guardian (or the authorised nominee/nominated person) will sign the child into care each day on an electronic attendance record using their unique PIN. This is required each day to verify the time children enter and depart from the service creating an accurate audit trail and enhancing child safety and accountability.

In the case of children transitioning from school to OSHC at the beginning or end of the school day, an educator will act on behalf of the parent and verify the record of attendance for the parent by signing the attendance record and recording the actual time the child enters/leaves the OSHC service, maintaining continuous and diligent supervision.

All persons signing a child out must be registered with signed authority to collect the child (except in an emergency):

- parent (unless parent is prohibited by a court order),
- authorised nominee (as recorded on enrolment form), or
- where the parent has provided written authorisation, and the departure is in accordance with the parent authorisation.

Where an authorised person is not known to the service, photo identification will be required before the child leaves the service. The authorised person's identification information will be noted on the child's enrolment record, adding an extra layer of security and verification for child protection.

Safe Arrival of Children Specific Risk assessment

The approved provider, in conjunction with educators of the service, will conduct a comprehensive risk assessment to identify any potential risk/s or hazards and ensure the safe arrival and departure of children who are travelling between the service and school. This proactive approach is fundamental to children's safety and wellbeing.

The risk assessment will be reviewed at least annually or immediately after any incident or circumstance where the health, safety or wellbeing of children may be compromised. All risk assessments will be regularly assessed and evaluated to facilitate continuous improvement in our service's child protection practices.

If a risk concerning a child's travel is identified during the risk assessment, the approved provider must update the safe arrival of children policy and procedure as soon as possible. The risk assessment must be stored safely and securely and kept for a period of 3 years.

The risk assessment will consider and include the following information:

- The age, developmental stages and individual needs of children, ensuring tailored safety measures and a child-centred approach
- The clear roles and responsibilities of:
 - The nominated supervisor of each service (where applicable)
 - The child's parents/family member
 - An authorised nominee listed on the child's enrolment form
 - A person authorised by a parent or authorised nominee listed on the child's enrolment form (if applicable)
- The role and responsibilities of the service the child is entering or leaving
- Clear communication arrangements made between the service the child is leaving from, and the service the child is entering, including arrangements if the child is missing or unaccounted for
- Procedures to be followed if a child is missing or unaccounted for during travel between services, ensuring immediate and effective response to critical incidents.
- Educator to child ratios required for adequate supervision during travel between services, upholding the highest standards of care and supervision.
- The proposed route and destination, assessing proximity to harm and hazards to minimise risk,
- The process for entering and exiting the service premises and the pickup location or destination (as required)
- Procedures to be followed to ensure children only leave the service in accordance with written authorisation from the parent or authorised nominee listed on the child's enrolment form, reinforcing security and protection against unauthorised collection.

Children attending Extra-curricular activities

Parents/guardians are responsible for informing the Service of any extra-curricular activities that their child/ren may be involved in whilst enrolled and booked to attend the Service. An *Outside Activity*

Permission form must be completed and returned to the service prior to any child being able to leave the Service to attend an extra-curricular activity, ensuring documented consent and accountability, and a clear record of external supervision arrangements.

The Nominated Supervisor shall discuss with the parent/guardian the impact that this may have on the Service. Discussions will include whether the child will be signed out of care by the service or the activity provider and who will be responsible for collecting the child and/or returning them to the Service when the activity is over.

Suitable negotiations and arrangements must be made as the Service may not be able to provide additional assistance to the parent/guardian in having their request met if they are asking for their child/ren to be dropped off or collected from the activity. Our priority remains the safe and supervised transitions of any child and maintaining appropriate supervision ratios for all children in care.

Notifying Absences

Children who have been notified as absent on a particular day/session will be marked absent by the Nominated Supervisor/responsible person/educator (manually or electronically). No action will be taken by the service to contact parents for children who are absent from Before School Care and Vacation Care/Pupil-Free Days.

Before School Care

Children who do not present for before school care are presumed absent for the session, as they will be travelling to the Service from a home setting rather than school (or other service) and the parent/guardian is responsible for the child's arrival.

After School Care

Parents/guardians are required to notify the Service of any ASC absences prior to the start of the session. Refer policy [6.3 Bookings and Cancellations](#) for details surrounding notifications for absences.

To remove any doubt, notification of a child's absence from school does not translate to the Service being notified. Due to the administrative burden and to promote parents/guardians to notify the Service of absences, parents/guardians may be charged a non-notification fee where confirmation is sought by the service (refer policy [7.10 Fees, Statements and Parent Gap Fee Payments](#))

Should a child not arrive as expected, the Service will follow the procedures set out below to confirm a child's whereabouts. Parents/guardians (or other authorised nominee) will be contacted immediately to confirm the absence. Where whereabouts cannot be established, police will be notified without delay, prioritising the child's immediate safety and well-being.

Arrival and Accountability Flowchart provides illustration of these procedures and decision-making

Children's Arrivals

Before School Care

1. All children are to be signed in by parents/guardians, authorised nominee or other relevant person.
2. All children not signed in at the end of the session will be marked as absent. Absences and non-signature sessions will be initialled by a Responsible Person and verified by the parents/guardians.

Collection and Sign-in - After School Care

1. An assigned educator will collect the Prep and Year 1 students from their respective classrooms at 2:55pm each day, ensuring a safe and supervised transition directly into OSHC care.
2. Prep and Year 1 students will be walked to the OSHC room where they will be signed in by the educator escorting them, maintaining clear accountability and continuous supervision.
3. Year 2-6 students will make their own way to the OSHC room and be signed in by an educator greeting them at the door.

4. Children will put away their bags in the allocated area and transition to the afternoon tea area.

Confirming Whereabouts

1. At approx. 3:10pm it is expected all children have arrived at the Service. Any child who has not arrived by 3:10pm will be accounted for by contacting relevant people to confirm location and/or absence, ensuring no child is left unaccounted for.
2. The educators signing in children is responsible for confirming the whereabouts of children that have not arrived. The delegated person will always be supported by the Nominated Supervisor to ensure proper procedure and a collaborative approach to child safety.
3. The first step in locating a child is to call the school office to confirm children who may have been absent from school (due to illness etc.).
4. The priority is then to confirm the children who would be expected to be attending by calling parents/guardians and/or emergency contacts. In the case of the school office confirming a child's absence from school, this will be confirmed as non-attending by contacting a parent/guardian or other person named in the enrolment form. Correspondence with parents/guardians will always be respectful. The educator may provide a gentle reminder to notify the Service when the confirmation phone call is made.
5. The Nominated Supervisor will, if necessary, communicate persistent non-notification issues with the parent/guardian to address the root cause of communication breakdowns to enhance child safety protocols.

Where a child's location cannot be confirmed, the following actions will be taken to locate the child and expected attendance by

- checking immediate proximity,
- communicating with the school office, and
- phoning all parents/guardians /emergency contacts.

Where a child cannot be located after reasonable effort to identify their whereabouts and where parents/guardians /emergency contact cannot be contacted the Police will be notified immediately and the child missing procedure will be followed, prioritising the child's safety.

Children's Departures

Requirements for children leaving the service (Regulation 99)

The child may only leave the relevant premises if the child:

- is given into the care of—
 - a parent of the child*; or
 - an authorised nominee named in the child's enrolment record; or
 - a person authorised by a parent or authorised nominee named in the child's enrolment record to collect the child from the premises; or
- leaves the premises in accordance with the written authorisation of the child's parent or authorised nominee named in the child's enrolment record; or
- is taken on an (approved) excursion, as outlined by policy
- is given into the care of a person or taken outside the premises—
 - because the child requires medical, hospital or ambulance care or treatment; or
 - because of another emergency.

Please note: a parent does not include a parent who is **prohibited by a court order from having contact with the child.*

Before School Care

Children who participate in sport or music programs within the school and where a parents/guardians has signed a permission for early release (recorded in the enrolment form/file), may be signed out early as the written parent/guardian permission indicates. All other children will be signed out by the responsible person at 8:55am

All Prep and Year 1 students will be transitioned to their relevant classroom by an educator at 8:50am.

After School Care/Vacation Care

The Service will have a representative positioned in close proximity to the sign-in/out area to supervise children's collection and will radio other educators to help families collecting children, streamlining the process while maintaining continuous vigilance for child safety.

All authorised nominees and parents/guardians sign children out via the equipment located in front of the OSHC office. All visitors and authorised nominees are requested to report directly to the OSHC office when collecting children, ensuring all departures are accounted for and authorised.

All persons signing a child out must be registered with signed authority to collect the child (except in an emergency):

- parents/guardians (unless parent is prohibited by a court order),
- authorised nominee (as recorded on enrolment form), or
- where the parent/guardian has provided written authorisation, and the departure is in accordance with the parent/guardian authorisation

Where the Service is not familiar with the person collecting the child, the responsible person supervising collection will request the person to evidence their identity (i.e. drivers licence). This information will be checked against enrolment records or other relevant authorisations, prioritising the child's security and preventing unauthorised collection.

A child will only be permitted to be collected where the authority permits. Where authorisation cannot be established, parents/guardians will be called immediately. Written authority (e.g., an email) is required for authorisation to collect a child unless the circumstance is an emergency.

Authorised Nominees

All authorised persons collecting children must be listed in the enrolment form or otherwise have written authorisation (where the collection is not related to an emergency). Evidence of the identity of the person collecting a child may be requested by the service, especially where the person is not known and to safeguard against unauthorised collection.

The Nominated Supervisor will ensure that the authorised nominee pick-up list for each child is kept up to date. In consultation with families, an older sibling can be nominated as an authorised nominee however they must be over the age of 16 to collect children from the service, in line with safeguarding principles and ensuring appropriate maturity for supervision. Refer *Children with Self-Care or Sibling Care Arrangements* further in this procedure.

All educators and staff are provided with comprehensive procedures and training on how to verify the identity of an authorised nominee, or a person authorised by the parent or authorised nominee to collect the child (including procedures of what to do when an unauthorised person attempts to collect a child).

Where staff are unsure of the authorisation, they are to contact the parent/guardian to seek clarification and advice. Notwithstanding any verbal direction, unless an emergency, the parent/guardian (or authorised nominee) must provide written advice before the child can leave the Service.

All relevant authorisations are to be kept in the enrolment record and any updates attached to this documentation (Regulations 161), ensuring complete, accurate, and readily accessible records for every child's safety and well-being.

Written authority (e.g. an email) is required for authorisation to collect a child unless an emergency.

If parents/guardians are not contactable, the Nominated supervisor will contact an authorised nominee (if enrolment permission allows) to seek advice and authority to release the child (written authority required). If parent/guardian (or relevant authorised nominee) does not provide written authority, the unauthorised person will be informed that the service cannot release the child – children may **only** leave the service in accordance with procedures contained within this policy, upholding the child's safety as the highest priority and preventing potential harm.

Management of Intoxicated Persons

Should a parent/guardian or person authorised to collect the child be suspected of being under the immediate influence of alcohol, drugs or other substances, the Nominated Supervisor or other Relevant educator will

- Make attempts to discuss concerns with the parent/guardian or authorised person, approaching the situation with sensitivity and a focus on the child's well-being,
- If not the parent collecting, then attempts will be made to contact the parent to discuss concerns,
- The child will only be released if required to by law. Should there be no other option but to release the child into the custody of a person suspected of being under the influence, and it is considered that an immediate threat to the welfare and wellbeing of the child/and or family exists, the Police will be called and advised of the threat and concerns immediately, ensuring appropriate protective action is taken.

The Nominated Supervisor will make reasonable attempts to delay the person from leaving the grounds while another educator collects as much relevant information as possible including the make, model, colour and number plate of any vehicle etc. These details will immediately be provided to the Police to aid their response, contributing to the swift and effective handling of a potential child protection risk.

In the event that the Nominated Supervisor establishes that a lockdown situation is warranted, the Nominated Supervisor/Responsible Person will initiate all or some (as appropriate) of the procedures as detailed in policy [2.13 Emergency Evacuation, Lockdown and Drills](#), ensuring the safety of all children and staff in a critical incident.

Children with Self-care or Sibling Care Arrangements

The Service recognises that families may use their discretion in determining the capacity of their own children to enter into self-care arrangements where their child/ren travels home or to another activity on their own or with an older sibling. The Nominated Supervisor will communicate with parents/guardians and authorised nominees (where relevant) if there are concerns regarding the safety and protection of children departing from the service in this manner.

Children's older siblings who are under the age of 18 may be authorised to collect and sign-out children from the Service, using the same authorisation methods as above, as there is no legally prescribed minimum age for doing so. However, the Service advises that parents realistically appraise some factors before authorising other children, including but not limited to:

- the capability and capacity of their children, such as their knowledge of what to do in the event of an emergency or 'stranger danger' situations,
- the distance between the Service and home, assessing potential risks along the route.
- the method of transport getting home, considering safety of independent travel.
- how long the children will then be at home unaccompanied,
- the children's means of communication with their parent, ensuring they can reach a trusted adult,
- any other legal parental considerations that are outside of the jurisdiction of OSHC.

The Service will provide families with information regarding children, siblings and self-care arrangements and ask that families use this information as a basis for determining the capacity of their child/ren to be left in self-care arrangements, empowering informed decision-making for child safety and promoting proactive risk assessment by families.

The Service will require that parents/guardians provide the following information along with the consent to depart notification:

1. The date/s and times of departure,
2. The child's destination,
3. Expected length of journey to destination (time and distance),
4. Mode of transport i.e. on foot or bicycle; and
5. Name and date of birth of older sibling collecting the child (if applicable).

The child will be signed out by an educator upon leaving the premises and the parent/guardian will be offered the opportunity to be notified (by phone, text or email) that the child has left. This arrangement will be negotiated by the needs of families and will additionally reflect the duty of care upheld by the service, demonstrating our commitment to ongoing communication and comprehensive child safety measures.

The Nominated Supervisor (or alternative delegate) will not allow the departure of a child if there is a reasonable concern about the safety or wellbeing of the child in doing so as the child's welfare is paramount and overrides all other considerations.

Departures due to Emergency (Regulation 99(4)(d))

A child may leave the premises where they have been given into care of a person because:

- the child requires medical, hospital or ambulance care or treatment, or
- another emergency

Where the departure relates to an emergency, a record of the departure will be recorded in an incident report (or other relevant evidence) by the Responsible Person, documenting the details of the emergency. Notification to the Regulatory Authority will also be required (refer policies [2.4 Incident, Injury, Trauma and Illness](#) and [7.7 Managing Notifications](#)), ensuring all critical incidents are formally recorded, reported, and reviewed to prevent future occurrences.

Late Collection

Nominated supervisor/Responsible Person will contact parents/guardians if child has not been collected by 6:00pm.

A late fee charge will be added to the account in circumstances where a child is collected late (refer policy [7.10 Fees, Statements and Parent Gap Fee Payments](#)) as late collection impacts staffing and child supervision, and may raise concerns about the child's welfare.

Parents/guardians are to advise the Service, preferably via phone, where unforeseen events have occurred and anticipate they will be unable to collect a child until after closing time, allowing the Nominated supervisor/Responsible Person to plan accordingly and reassure the child, minimizing anxiety.

In the event a child has not being collected a half-hour after closing time (6:30pm) **and** there is no response from a parent/guardian, authorised nominee or emergency contact, advice will be sought from the police and an incident report completed (refer policies [2.4 Incident, Injury, Trauma and Illness](#) and [7.7 Managing Notifications](#)), escalating the matter immediately to ensure the child's safety and welfare, and activating emergency response protocols.

Incident Management – Children's Arrivals and Departures

Children who arrive without a booking

Enrolled children:

1. Where a child(ren) presents to the Service without a booking and is known to the service (i.e. enrolled), the Nominated Supervisor/Responsible Person will contact the parents/guardians in the first instance and inform/resolve the absence of care and supervision, prioritising their immediate safety and ensuring they are accounted for.
2. At no time is an OSHC employee to send a child away in instances where the whereabouts of the parent/guardian is unknown, and a child is seeking assistance as this could compromise their safety and violate our duty of care.
3. When contact is made with a parent/guardian and there has been confusion about attendance and if it is possible to include a child (being mindful of ratios and capacity) and at the parent/guardian's request, then the child may be signed in and participate in the program, ensuring children are always supported and safe within the service.

Non-Enrolled children:

1. Where a child(ren) is not known to the Service, the Nominated Supervisor or Responsible Person will make communication with the school.
2. Where the school cannot be contacted, the Nominated Supervisor/Responsible Person will then attempt to contact the parent/guardian directly, if possible.

3. Where the school office is unattended or parents/guardians uncontactable, the child will be asked to sit in the OSHC office. The Service will ensure the child(ren) are safe, secure and comfortable but are not participating in the activities or program of the service, maintaining their safety without integrating them into the program until authorised, to protect both the child and other children in care.

Parents/guardians are unable to be contacted:

1. Where no contact can be made with a parent/guardian in a reasonable time, then the Service must call the police for support and guidance, signifying the seriousness of the situation and immediately involving external authorities for the child safety and wellbeing.
2. The Service will complete an incident report and communicate details with the school for additional management.

Child Leaving without Permission

1. If a child leaves the service premises without permission or without the authority described above (including being collected by an unauthorised person), the Nominated Supervisor or Responsible Person will assess the situation immediately and consider the appropriate response, prioritising the child's immediate safety and well-being.
2. Educators will not leave the Service to follow a child if:
 - It will or may leave the other children in the centre with insufficient supervision.
 - It may increase the risks and hazards by escalating the circumstance.
 - It will or may expose that staff member to an unacceptable risk of personal harm

These guidelines ensure the safety of all children in care is maintained, and staff are not placed at undue risk.

3. Where both possible and practical, educators will continue to supervise the child and encourage their return using de-escalation techniques where appropriate and maintaining visual contact.
4. Should a child be unresponsive to prompts or the situation is dangerous, either the police or parents/guardians will be called (or both) immediately, signifying a critical incident and activating emergency response protocols.
5. Should there be concerns, the child may continue to leave without permission, a parent/guardian will be called to collect the child.
6. In circumstances where the child has been collected, the enrolment will be suspended until appropriate planning has occurred and the Service is satisfied with their capacity to safely care for the child, ensuring future safety and a review of the child's support needs.
7. The incident will be documented and notified as per, policy [2.4 Incident, Injury, Trauma and Illness](#).
8. Following the incident, consultation with parents/guardians, the Approved Provider and Nominated Supervisor will direct the plan of action moving forward. Temporary suspension from the Service may be considered where there is a risk to safety, demonstrating a firm and consistent commitment to maintaining a safe environment for all children.

Children Unaccounted for During the Program

1. In the event that a child is unaccounted for during the operating hours of the program, the Nominated Supervisor will be notified immediately by the educator as soon as the disappearance is discovered/identified, triggering an immediate and urgent response.
2. Educators will communicate via walkie-talkies to confirm location or sighting, ensuring efficient and rapid information sharing to locate the child.
3. Should the child continue to be unaccounted for, children will be assembled for a roll call which may include implementing a lockdown procedure.
4. The Nominated Supervisor will delegate a suitable educator to undertake a rapid and comprehensive search of the Service premises to locate the child.
5. In the event that the child is still not located, and there is an immediate concern for the child's safety, the police (000) will be called. Alternatively, the child's parent/guardian will be contacted.
6. The incident will be documented and notified as per policy [2.4 Incident, Injury, Trauma and Illness](#).

An incident report will be completed and will include information such as:

1. Date, time and location of the child when they were last accounted for,
2. Details of the supervising educator, and the circumstances surrounding their disappearance including how many educator's vs children where in the space and where the educators were located
3. Details of actions instigated to locate the child,

4. What the child was wearing and any distinguishing features; and
5. Time parents/guardians and other agencies were contacted.

The Approved Provider will be advised immediately upon calling the Police and the Regulatory Authority will be notified as per the procedures outlined in policy [7.7 Managing Notifications](#)

Child Leaving in an Unauthorised Manner

1. If a child leaves the Service in a manner that is inconsistent with the authority provided (including being collected by an unauthorised person), any staff becoming aware will immediately report the circumstance to the Nominated Supervisor or Responsible Person.
2. The Nominated Supervisor or Responsible Person will assess the situation and will call—
 - a. The police (000) - should there be a concern of immediate danger, and/or
 - b. A parent/guardian.
3. Where both possible and practical, relevant details such as descriptions of any person collecting the child and/or their vehicle will be noted, including the make, colour, registration number and direction of travel.
4. The incident will be documented and notified as per policy [2.4 Incident, Injury, Trauma and Illness](#).

In the circumstances of the child leaving with a parent named in a parenting plan or custody court order, it must be noted that the Service *CANNOT PHYSICALLY PREVENT A PARENT FROM TAKING THEIR CHILD FROM THE PREMISES*. As such, while the Nominated Supervisor/ Responsible Person will attempt to abide by any custody court orders, should the safety of other children or educators be considered at risk, children will be released and the custodial parent and/or police contacted immediately.

The Approved Provider will be advised immediately upon calling the Police and the Regulatory Authority will be notified as per the procedures outlined in policy [7.7 Managing Notifications](#)

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.12 Meaning of serious incident
 - R.85 Incident, injury, trauma and illness policies and procedures
 - R.86 Notification to parents of incident, injury, trauma and illness
 - R.87 Incident, injury, trauma and illness record
 - R.99 Children leaving the education and care service premises
 - R.158 Children's attendance record to be kept by approved provider
 - R.161 Authorisations to be kept in enrolment record
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA4 – Staffing arrangements
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities.

Additional Regulatory Context and Guidance

- [Child Protection Act 1999 \(Qld\)](#)
- [Criminal Code Act 1899 \(Qld\)](#)
- Department of Education - [Child Care Provider Handbook](#)
- Queensland Government [Statement of Shared Commitment](#)
- [National Principles | Child Safe Organisations](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related policies and procedures

[2.1 Providing a Child Safe Environment](#)

[2.4 Incident, Injury, Trauma and Illness](#)

[6.3 Bookings and Cancellations](#)

[6.4 Acceptance and Refusal of Authorisations](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.7 Managing Notifications](#)

[7.10 Fees, Statements and Parent Gap Fee Payments](#)

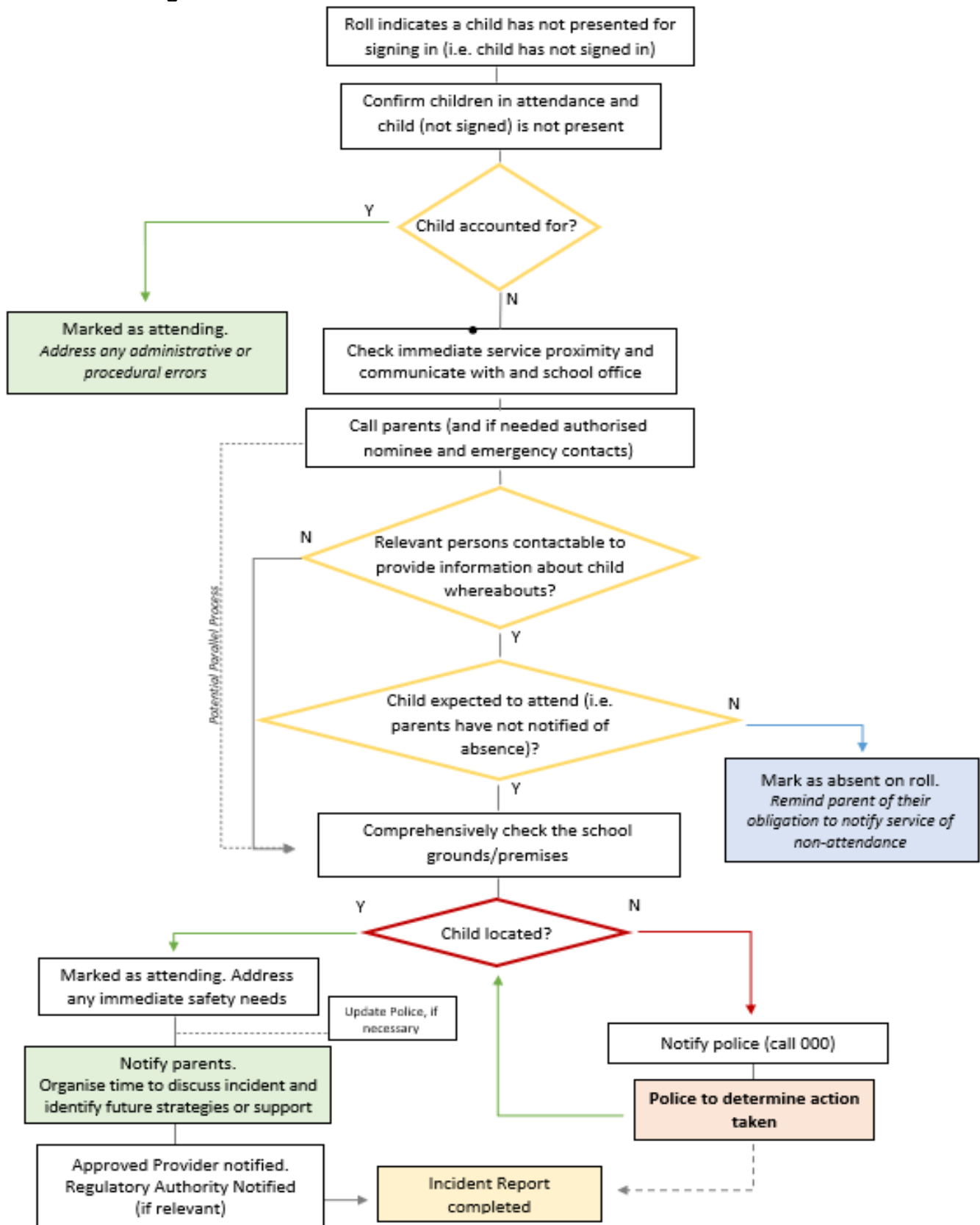
Forms and Resources

[Arrival and Accountability Flowchart](#)

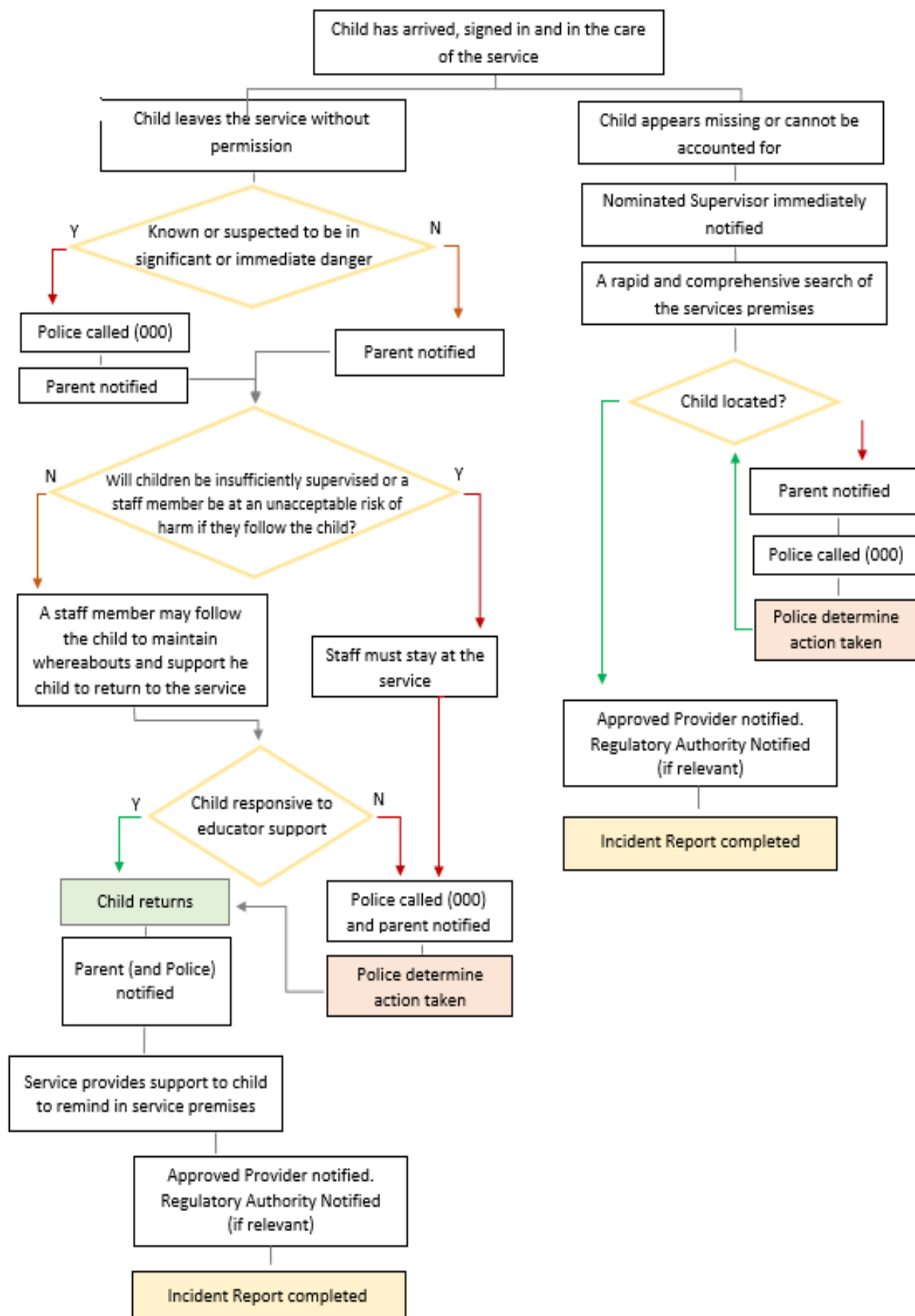
Policy 2.3 Safe Arrivals and Departures of Children		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Address regulatory changes		
V2-06.2024 – additional information relevant to Children with self-care or sibling care arrangements		
V3-03.2025 – Added information for all roles and responsibilities, additional procedures relevant to the signing in and out process, safe arrival of children risk assessment, children with sibling or self-care arrangements, additional information included related to administration of attendance records, authorised nominees and management of intoxicated persons, added reference to Statement of Shared Commitment.		
V4-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced key tasks and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V4-04.2026 – No updates		

Arrival and Accountability Flowchart

ASC – Non Arriving Child



Child Unaccounted For or Leaving Without Permission



2.4 Incident, Injury, Trauma and Illness

Policy Statement

The purpose of this policy is to ensure the highest standards of health, safety, and wellbeing for all children, staff, and visitors at the Service with particular attention to cultural safety. The policy outlines the procedures for managing incidents, injuries, trauma and illness events effectively, swiftly and with cultural sensitivity to ensure the wellbeing of all individuals involved. Notwithstanding the Service's efforts to proactively prevent injuries or trauma occurring at the service, where it occurs, the Service will take action to minimise the impact of injuries, trauma and illness.

The Nominated Supervisor, or the Responsible Person in their absence, will typically lead the response to any significant events, ensuring all actions are culturally responsive and trauma-informed. All appropriately qualified educators will support in the initial response to any incidents occurring at the Service. All other educators will provide support within their training and capacity, raising the alarm for additional help.

The Service recognises that parents/guardians must be informed of all significant and serious matters impacting their children. Records that are created to document incidents and events will be accurate and concise. These documents and all relevant information will be provided to parents/guardians in a timely manner with consideration for culturally appropriate communication methods and language.

Definitions:

Incident: Any unplanned event resulting in or having potential for injury, ill health, damage or other loss.

Injury: Any physical damage to the body caused by violence or an incident.

Trauma: An emotional wound or shock that often has long-lasting effects or any physical damage to the body caused by violence or an incident. This includes psychological or emotional distress resulting from events that undermine a child's sense of cultural safety or belonging.

Minor incident: An incident that results in an injury that is small and does not require medical attention (e.g., a band aid)

Major incident: Any incident that we report to the regulatory authority, including head injuries, trauma, or incidents where emergency services may attend.

Definition of Serious Incident

Serious Incidents (as defined in National Regulation 12), includes the follow occurrences:

- the death of a child
 - while that child is being educated and cared for by an education and care service; or
 - following an incident occurring while that child was being educated and cared for by an education and care service,
- any incident involving serious injury or trauma to a child occurring while that child is being educated and cared for by an education and care service
 - which a reasonable person would consider required urgent medical attention from a registered medical practitioner; or
 - for which the child attended, or ought reasonably to have attended, a hospital; Example— A broken limb.
 - any incident involving serious illness of a child occurring while that child is being educated and cared for by an education and care service for which the child attended, or ought reasonably to have attended, a hospital; Example— Severe asthma attack, seizure or anaphylaxis reaction.
- any emergency for which emergency services attended (This means an incident, situation or event where there is an imminent or severe risk to the health, safety or wellbeing of a person/s at an education and care service. It does not mean an incident where emergency services attended as a precaution¹.);
- any circumstance where a child being educated and cared for by an education and care service

- appears to be missing or cannot be accounted for; or
- appears to have been taken or removed from the education and care service premises in a manner that contravenes these Regulations; or
- is mistakenly locked in or locked out of the education and care service premises or any part of the premises.

In addition to ensuring a suitable response to managing critical events, the Service has a duty to notify any Serious Incidents to parents/guardians and the Regulatory Authority and will follow the procedures outlined in policy [7.7 Managing Notifications](#) for reporting Serious Incidents, ensuring transparency and accountability.

Roles and Responsibilities

Approved Provider	• Ensure all significant events (incident, illness, injury or trauma) occurring at the service are responded to with timeliness and responsiveness, prioritising child safety and wellbeing, and cultural safety. • Ensure all responses are compliant with relevant regulations or legislation, including the Queensland Child Safe Standards. • Ensure staff are equipped with knowledge and training to fulfil their duties with a focus on trauma-informed practices and cultural competence,.
Nominated Supervisor	• Lead the response to any significant events occurring at the service, ensuring responses are sensitive to the cultural background and individual needs of the child involved. • Provide timely notification to parents/guardians and the Approved Provider and no more than 24 hours after the events, using culturally appropriate communication methods. • Provide instruction to staff and volunteers on incident, illness, injury and trauma management, emphasising child-focused and culturally safe approaches. • Ensure record of events are recorded as soon as practicable and at least written in less than 24 hours after the event. • Ensure records are maintained and stored according to service procedures and respecting privacy and confidentiality.
All Staff	• Provide immediate care and support to any significant event, prioritising the child's physical and emotional safety and cultural comfort. • Accurately record events in a timely manner and inform the Nominated Supervisor of any significant issues as soon as practicable, contributing to a culture of openness and accountability.
Families	• Provide authorisation in the child's enrolment form for the approved provider, nominated supervisor or an educator to seek emergency medical treatment for the child from a registered medical practitioner, hospital or ambulance service and, if required, transportation by an ambulance service • Be contactable, either directly or through emergency contacts listed on the enrolment form, in the event of an incident requiring medical attention • notify the Service if there has been a change in the condition of the child's health, or of recent accidents or incidents that may impact the child's care • Collect the child as soon as possible when notified of an incident, injury, trauma or illness • Ensure contact details of authorised nominees are kept up to date in the child's enrolment information

Key Tasks and Responsibilities

Planning Procedures	The Approved Provider will coordinate with the Nominated Supervisor to ensure appropriate plans and resources are established to respond to relevant incidents. This includes induction practices to ensure educators are

	aware of responsibilities and are trained in child safe practices and cultural sensitivity.
Leading Response	The Nominated Supervisor or Responsible Person will take charge in leading the response and management of incidents. They are supported by educators, especially first aid qualified, in caring for children and calling for emergency services, ensuring that all actions are child-centred and culturally responsive.
Documenting Incidents	The person taking the primary role in managing the incident will be responsible for writing the incident report. However, they may be supported by educators who were witness to the events, ensuring accuracy and comprehensive detail.
Notifications	The Nominated Supervisor or Responsible Person will communicate the incident with parents/guardians, and if needed, the Regulatory Authority and Approved Provider, maintaining transparent and culturally appropriate communication channels.

Procedures

Managing and Responding to Critical Events

At all times there are educators present in the service that hold Senior First Aid qualifications including CPR, asthma and anaphylaxis training. Should an accident or sudden illness occur educators will immediately commence first aid, and a parent/guardian will be contacted to collect the child or in emergency situations advised of the plan of action regarding further medical treatment

The Nominated Supervisor (or Responsible Person) will lead the response to any critical events to ensure the safety and wellbeing of children attending the service. The management of emergency or critical situations will adopt the following principles:

- Staff providing comfort and reassurance to the child, acknowledging their emotional state and wellbeing.
- Actively seeking the assistance of a first aid qualified educator,
- All first aid qualified educators administering care within the bounds of their training,
- Ensure all other children are appropriately supervised, actioning an emergency evacuation or lock-down, if required,
- Uphold the dignity and comfort of children, removing them to quiet or private areas of the service (as needed), respecting their privacy and cultural needs during distress.
- Providing timely information and notification to parents/guardians as so far as practicable; and
- Ensure the child(ren) is/are actively monitored and supervised with the intention to escalate the response, if needed (i.e. additional emergency support).

If a critical incident occurs and parents/guardians are unable to accompany their child to the hospital, the Nominated Supervisor, or qualified educator who administered the first aid, will accompany the child provided that they leave at least one educator who is qualified in first aid at the Service and that educator ratios are still met.

Injury Responses and Management (i.e. First Aid and Medical Support)

The first steps in responding to a child's physical injury or illness will be first aid. Qualified educators will respond with immediate treatment as outlined by their training. Notification to the Nominated Supervisor (via walkie-talkie etc.) will occur as soon as practicable.

As a guide the following steps will be taken, as necessary:

1. Staff will address any immediate dangers or hazards (to ensure no further injury/harm occurs).
2. Staff will attend to all injuries and address any life-threatening circumstances as a priority, communicating the need for support. A call to emergency services (000) will be made immediately.
3. Should the injury be assessed as serious or critical (such as possible fracture/break, concussion, etc) emergency services (000) will be called and further advice sought.

4. Staff will seek to comfort and calm the child using culturally appropriate comfort strategies, while a first aid qualified educator monitors the child's injury.
5. The Nominated Supervisor (or Responsible Person) will be notified as soon as practicable.
6. Parents/guardians will be contacted by the Nominated Supervisor or delegated educator to advise of the incident and subsequent injury, confirm emergency authorisations and coordinate a plan of action, ensuring clear and culturally appropriate communication.
7. Dependent on authorisations and circumstances, the following may occur:
 - Medication administered
 - Transportation to hospital
 - Parents/guardians collect the child for medical treatment
 - Relevant treatment outlined in medical action plan, or guided by training or emergency services
8. Should the injury be assessed as non-serious, as soon as practicably possible, the parent/guardian will be called by an available educator to notify of the injury and action taken to manage the circumstances, reinforcing transparent communication.
9. The child's condition will be continually monitored by a qualified educator, any changes to the health or condition of the child will be suitably escalated.
10. The child will continue to be monitored until appropriate medical care has arrived or until the parent/guardian's arrival (i.e. child's departure).

Head Bumps and Head Injuries

All head bumps and head injuries will be reported to the Nominated Supervisor or Responsible Person immediately and the child will be assessed by a first aid qualified Educator.

If the child has a visible physical mark (e.g. bump, cut, swelling) or displays unusual behaviour:

- Emergency Services (000) will be contacted immediately, and
- The parent/guardian will be called by telephone (voicemail or text) as soon as practicable to inform them of the incident and that emergency services have been contacted.

If there are NO visible physical marks and NO unusual behaviour:

- The child will be closely monitored by a first aid qualified educator, and
- The parent/guardian will be contacted by telephone (voicemail or text) as soon as practicable to inform them of the incident and that the child is being monitored.

The child will be observed and monitored closely by a first aid qualified Educator to ensure there are no signs or symptoms of concussion. During monitoring, staff must be alert for signs of concussion, including but not limited to:

- Appearing unsettled
- Excessive drowsiness or attempting to fall asleep
- Vomiting

If any of these symptoms are observed, 000 will be contacted immediately, and the family notified that emergency services have been called.

Depending on the nature and severity of the incident, the service may require a medical certificate confirming that the child is fit to return to care.

Actions for managing the response to an anaphylaxis, asthma or diabetic emergency can be found in policy [2.9 Medical Conditions in Children](#).

Once the circumstances have stabilised, the educator providing care will begin documenting the events.

Illness Response and Management

Where a child presents or has been identified as suffering from an illness, the following actions will be taken:

1. Staff are to address any immediate hazards (containing solid/contaminated areas etc.) and notify the Responsible Person or Nominated Supervisor as soon as reasonably practicable.
2. Staff should attend to the child's needs and apply (or call for) first aid treatment, if relevant.
3. Where a child's illness relates to a medical condition, the relevant Medical Management Plan must be followed.

4. The child will be cared for in the OSHC office or other suitable space. Management actions should be consistent with policy [2.7 Infectious Diseases](#) and limit the potential exposure to infection while ensuring the child feels safe and culturally comfortable.
5. The Responsible Person/Nominated Supervisor will assess the child's illness and make contact with the parent/guardian (or where unavailable, emergency contacts) to discuss a plan for the immediate care and collection using culturally sensitive communication.
6. In the interim of being collected the child will be suitably comforted and monitored for change in symptoms or escalation of emergency response.
7. Where a child's illness is significant the Responsible Person/Nominated Supervisor will call 000 for an ambulance or relevant alternative medical treatment.
8. Where possible the details of the illness will be noted to support the completion of illness records.

Once the circumstances have stabilised, the educator providing care will begin documenting the events.

Trauma Response and Management

Signs of trauma could include but are not limited to:

- Emotional distress or disassociation
- Sudden or significant changes in behaviour
- Physical injury
- Aggression or avoidance

Where a child/ren experiences a traumatic event while being educated and cared for the following steps will be taken:

1. Staff will seek to manage the immediate situation, addressing any presenting hazards.
2. Children will be offered emotional and social support suitable to the nature of the situation, with staff engaging in actively listening and emotional validation and considering their cultural background when providing support.
3. Staff should attend to any presenting immediate needs, including the awareness of child protection actions (refer policy [2.14 Child Protection and Mandatory Reporting](#))
4. Depending on the circumstances, the child may be invited to a quiet area, such as the OSHC office, while escalation or immediate support is occurring ensuring their privacy and cultural comfort.
5. The Responsible Person/Nominated Supervisor will be informed of the details as soon as reasonably practicable.
6. The parents/guardians (or where unavailable, emergency contacts) of the child will be called to be notified of the matter with consideration for culturally sensitive communication.
7. The Responsible Person/Nominated supervisor will be responsible for coordinating a suitable response, where relevant additional or emergency services response may be applicable and called upon, ensuring a holistic and culturally informed approach to trauma recovery.

Once the circumstances have stabilised, the educator providing care will begin documenting the events - see steps under Documenting an Incident, Illness, Injury or Trauma Event.

A Child Missing or Unaccounted For

Refer policy [2.3 Safe Arrivals and Departures of Children](#)

A Child Mistakenly Locked In or Out of the Service

In an instance where a child has been mistakenly locked in or out of the service, staff should look to immediately address the situation by opening the locked area. Staff should then:

1. Support the child's immediate wellbeing to ensure they are emotionally supported by the incident, providing reassurance and culturally sensitive comfort.
2. As soon as practicable, the Nominated Supervisor (or Responsible Person), should notify the parent/guardian of the event with transparent and timely communication.
3. An incident report will be completed by the staff member initially responding, with support of the Nominated Supervisor.
4. The details of the incident will be reported to the Approved Provider as soon as practicable.
5. The Nominated Supervisor and Approved Provider will coordinate the preparation and submission of the notification, following the steps outlined in policy [7.7 Managing Notifications](#)
6. Following the submission of the notification, the Approved Provider will coordinate an appropriate investigation into the circumstances of the incident, outlining steps of improvement to mitigate future occurrences, demonstrating a commitment to continuous improvement in child safety.

7. The Approved Provider and Nominated Supervisor will collaborate any necessary additional response as determined by the Regulatory Authority.

Death of a Child

Management and educators will ensure that immediate and appropriate action is taken in the event of the death of a child whilst at the Service by following and implementing the following procedures:

1. Immediately call emergency services and provide immediate First Aid and/or CPR in accordance with current First Aid training.
2. Assess the situation and evacuate children to the appropriate area (evacuation or lockdown, depending on circumstance).
3. As soon as practicable, the Nominated Supervisor (or Responsible Person), should notify the parent/guardian of the event. Medical staff/emergency services will advise families of the situation and the death of their child with utmost sensitivity and cultural respect.
4. WorkSafe Qld will be notified within the first hour of the incident/fatality occurring
5. The Approved Provider will contact the insurance company

Becoming aware a child has died as the result of an incident while being cared for by the service:

1. An incident report will be completed by the staff member initially responding and any witnesses, with support of the Nominated Supervisor.
2. The details of the incident will be immediately reported to the Approved Provider.
3. The Approved Provider will lead the coordination of reporting, including correspondence with the Regulatory Authority, parents/guardians, and police ensuring a coordinated and compassionate response.
4. The Nominated Supervisor and Approved Provider will coordinate the preparation and submission of the notification, following the steps outlined in policy [7.7 Managing Notifications](#).

The Approved Provider will ensure that parents/guardians, families, children and educators receive adequate and appropriate post-incident support including culturally appropriate grief and trauma counselling where needed.

Accepting Children from School (ASC)

If a child needs assistance to enter the service, e.g., they are having trouble walking, they will be referred to the school for them to continue treatment of the child. In this instance the parent/guardian will be notified by the Service that the child has not been signed in and is in the care of the school. In addition, the parent/guardian will not be charged for the child for the afternoon.

On arrival at sign in (BSC)

If a parent/guardian brings a child into the Service for a before school care session and the child needs assistance to enter the service, e.g., they are having trouble walking, the parent/guardian will be advised that the child is unable to attend the Service at this time.

If there has been a known injury or illness the Service will request a statement from a medical professional advising that the child is fit and able to return to the service. Verbal approval from a parent/guardian will not be accepted, reinforcing the importance of professional medical clearance for child safety.

Families must inform educators of any injuries/trauma sustained by their child outside of OSHC hours by completing an *Injury on Intake Form* on arrival. This form details the circumstances of the injury, illness or trauma and the nature of the injuries sustained.

Educators will ensure this form is checked and signed prior to families leaving their child for the day and ensure the child is monitored as required. This form may be used for burns, broken limbs, previous hospital admissions etc.

In circumstances where the *Injury on Intake Form* is being used to record injuries that have not been advised by families, the Nominated Supervisor will consider if the family should be contacted immediately to advise of the injuries noted or if policy [2.14 Child Protection and Mandatory Reporting](#) should be consulted for appropriate actions. It may not be appropriate to request families to sign this form under these circumstances.

Other Circumstances and Actions

Where circumstances arise that do not have specific procedures set out to follow, educators must use professional judgement to actively protect the safety and wellbeing of children as a first priority with cultural sensitivity always at the forefront. Possible actions include:

- a) Emergency evacuation procedures
- b) Lock-down/harassment procedures
- c) Notifying emergency services (police etc.)

Where the nature of the event involves disaster response, educators should seek advice from emergency services, other professional(s) relevant to the circumstances, and/or parents/guardians; in order to manage the immediate actions/treatment.

Following the incident/events being controlled, educators then need to notify the Approved Provider. Should the circumstance present as a risk to health and safety, notification to the Regulatory Authority will be required as set out in policy [7.7 Managing Notifications](#)

Notification to Parent/Guardian (or Authorised Nominee)

Parents/guardians must be notified of any injury, trauma or illness which occurs while a child is being educated and cared for by the Service. Depending on the circumstance, including the significance of the incident, urgency, and any practical limitation, the notification can be via—

- A phone call,
- In-person (when collecting the child), or
- Via a copy of the Incident, Injury, Illness, or Trauma Report.

Regardless of the method of communication, a parent/guardian must be notified as soon as practicable, but not later than 24 hours after the occurrence. The details of this notification are recorded in the Incident, Injury, Trauma and Illness Report. Depending on the circumstances, a proportionate response – i.e. an immediate phone call in a critical situation, or in-person at collection/email for minor injuries, will be used to communicate the details of these events with families, always with cultural sensitivity in mind.

To promote transparency, standard practice is to provide a copy of the Incident, Injury, Trauma and Illness Report, which contains the ability to record the parent/guardian's receipt of the information by way of signing the record. Parents/guardians can access copies of their children's Incident, Injury, Trauma and Illness Reports when requested.

Notwithstanding notification requirements, subject to procedures set out in policy [7.6 Privacy and Confidentiality of Records](#), personal details that do not relate to the parent/guardian's child contained within an Incident, Injury, Trauma and Illness Report may be redacted where there is not written authorisation to disclose this information.

If the Approved Provider/Nominated Supervisor becomes aware of an incident after the fact from a parent/guardian, they should notify the Regulatory Authority within 24 hours of being notified that the incident was serious. e.g., a child has hurt their wrist but is not in serious pain and continues to play, the next day the parent/guardian advises that the child has sustained a fracture.

Documenting an Incident, Injury, Trauma and Illness Event

An Incident, Injury, Trauma and Illness Report must be completed, as soon as reasonably possible (but at least within 24 hours) after a child is involved in any incident, suffers an injury, trauma or illness.

Typically, the person who took the primary lead in managing the incident will be responsible for writing the record. Where this isn't achievable the Nominated Supervisor or Responsible Person will source the person with most direct observation of the incident to complete the record. It is the responsibility of the Nominated Supervisor or the Responsible Person in charge of the session of care to ensure the full record has been completed within the timeframe required.

The information contained in the Incident, Injury, Trauma and Illness Report forms must not be used for any purpose except strictly in accordance with this policy, [7.6 Privacy and Confidentiality of Records](#) and any other relevant service policies, upholding privacy and ethical data handling.

Report Content

The incident, injury, trauma and illness record must include (National Regulation 87):

- details of the incident/event, including:
 - the name and age of the child; and
 - the circumstances leading to the incident, injury or trauma; and
 - the time and date the incident occurred, the injury was received or the child was subjected to the trauma; or
- details of any illness which becomes apparent while the child is being educated and cared for including—
 - the name and age of the child; and
 - the relevant circumstances surrounding the child becoming ill and any apparent symptoms; and
 - the time and date of the apparent onset of the illness
- details of the action taken by the service, including—
 - any medication administered or first aid provided; and
 - any medical personnel contacted.
- details of any person who witnessed the incident, injury or trauma,
- the name of any person whom the service notified (or attempted to notify), and the time and date of the notifications or attempted notifications,
- the name and signature of the person writing the record, and the time and date report was created.

Any Serious Incidents must be reported to the Approved Provider as soon as practicable. A copy of the report will also be forward to the Approved Provider once completed.

Confidentiality

All Incident, Injury, Trauma and Illness Reports will be stored securely as set out in policy [7.6 Privacy and Confidentiality of Records](#). Disclosure of private information contained within an Incident, Injury, Trauma and Illness Report will only occur as permitted by legislation, including Regulation 177 and the corresponding written authorisation.

Regulatory Notification – Serious Incidents

Where the circumstances surrounding the incident meet the requirements for regulatory reporting, steps contained in policy [7.7 Managing Notifications](#) will be followed, ensuring full compliance with child protection legislation and child safe practices, where relevant.

If the attention of a medical practitioner was sought or the child attended hospital in connection with the injury, trauma or illness. The incident is a 'serious one' and must be notified. Furthermore, the parent/guardian will be required to provide documentation from a medical practitioner giving a medical clearance in writing prior to the child returning to the service.

Notification to WorkSafe Qld will be made by the Approved Provider for all incidents where any person required immediate treatment as an in-patient in a hospital.

To decide if an injury, trauma or illness is a 'serious incident' when the child did not attend a medical practitioner or hospital, we will consider the following issues:

- Was more than basic first aid needed to manage the injury, trauma or illness?
- Should medical attention have been sought for the child?
- Should the child have attended a hospital or an equivalent facility?

Authority to Provide Medical Attention

Written consent from the child's parent/guardian /authorised persons will be sought through the enrolment process for the Nominated Supervisor and/or staff member qualified in first aid, to obtain medical attention, in keeping with the policies and procedures of the service, if required. Should the child have a relevant health condition, they will be required to have a management (action) plan, risk minimisation assessment and communication plan, ensuring a comprehensive and culturally responsive approach to health management. (refer policy [2.9 Medical Conditions in Children](#)).

Written consent will also be obtained from the parent/guardian/authorised persons for the use of all health and other personal information which the service has relating to the child, for the purpose of enabling the service to:

- Administer care and assistance to the child, including by obtaining emergency or other medical assistance or care for the child in accordance with this policy; and
- Report any incident, injury, illness or trauma as required by law.

To remove any doubt, all costs incurred in obtaining medical attention for a child will be met by the parents/guardians /authorised persons (i.e. the account holder). Under the Community Ambulance Cover Act 2003, all Queensland residents are covered for ambulance transport services anytime, anywhere across Australia. Families who are not Queensland residents must seek cover at their own cost.

Facilities and Resources

Disposable gloves will be worn when administering first-aid, and will be disposed of immediately after use, maintaining hygiene and safety standards in accordance with policy [2.5 Administration of First Aid](#).

The Nominated Supervisor will, or delegate a qualified educator to, ensure that the following are kept at the service at all times, and are accessible to the educators but not to children:

- A fully maintained and equipped first aid kit, adequate for the number of children attending the service, and that items stored in the first aid kit are within the identified use by date (where applicable)
- Service Phone,
- A recognised and current first-aid manual,
- A cold pack and/or ice ready for use in the administering of first aid,
- A store of disposable gloves; and
- Current emergency contact telephone numbers.

Training and Instruction

Induction material and processes will ensure all educators and volunteers are trained around the requirements and expectations for responding to incidents. This is complemented by ongoing training and debriefing of incident management procedures. All persons with responsibilities to care for children must be able to demonstrate how they will—

- alert service leaders of an incident in a timely manner,
- provide care for children during an incident with a focus on trauma-informed and culturally sensitive care,
- their role in supporting the service to meet relevant reporting requirements.

Quality Improvement

Following any significant event, the Nominated Supervisor will debrief the events with educators, identifying any area of learning of improvement. The actions identified will be reported to the Approved Provider, who will ensure appropriate action is taken, fostering a culture of continuous learning and improvement in child safety and wellbeing.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.167 Offence relating to protection of children from harm and hazards
 - s.173 Offence to fail to notify certain circumstances to Regulatory Authority
 - s.175 Offence relating to requirement to keep enrolment and other documents
- **Education and Care Services National Regulations:**
 - R.12 Meaning of serious incident

- R.85 Incident, injury, trauma and illness policies and procedures
- R.86 Notification to parents of incident, injury, trauma and illness
- R.87 Incident, injury, trauma and illness record
- R.90 Medical conditions policy
- R.97 Emergency and evacuation procedures
- R.99 Children leaving the education and care service premises
- R.160 Child enrolment records to be kept by approved provider and family day care educator
- R.161 Authorisations to be kept in enrolment record
- R.162 Health information to be kept in enrolment record
- R.168 Education and care service must have policies and procedures
- R.170 Policies and procedures to be followed
- R.171 Policies and procedures to be kept available
- R.174 Time to notify certain circumstances to Regulatory Authority
- R.174A Prescribed information to accompany notice
- R.177 Prescribed enrolment and other documents to be kept by approved provider
- R.181 Confidentiality of records kept by approved provider
- R.183 Storage of records and other documents
- **National Quality Standard:**
 - QA2 – Children’s health and safety

Additional Regulatory Context and Guidance

- [Child Protection Act 1999 \(Qld\)](#)
- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)
- [NQF Child Safe Culture Guide Final 1.pdf](#)

Related policies and procedures

- [2.1 Providing a Child Safe Environment](#)
- [2.3 Safe Arrivals and Departures of Children](#)
- [2.5 Administration of First Aid](#)
- [2.7 Infectious Diseases](#)
- [2.8 Hygiene, Health and Wellbeing Practices](#)
- [2.9 Medical Conditions in Children](#)
- [2.10 Administration of Medication](#)
- [2.13 Emergency Evacuation, Lockdown and Drills](#)
- [2.14 Child Protection and Mandatory Reporting](#)
- [2.17 Child Safety and Wellbeing](#)
- [3.5 Emergency and Safety Equipment](#)
- [5.2 Positive Behaviour Support Practices](#)
- [6.11 Cultural Safety](#)
- [7.4 Leading Compliance and Quality Assurance](#)
- [7.6 Privacy and Confidentiality of Records](#)
- [7.7 Managing Notifications](#)

Forms and Resources

- [Incident, Injury, Trauma and Illness Report](#)

Policy 2.4 Incident, Injury, Trauma and Illness		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – no updates		
V1-03.2025 – no updates		
V2-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced key tasks and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – added family's roles and responsibilities, added procedures relevant to injury on intake form		

2.5 Administration of First Aid

Policy Statement

The Service acknowledges its responsibility to ensure appropriate procedures are in place for managing incidents, including injuries and illnesses where first aid treatment is required. Ensuring the workplace has established systems that provide the resources and expertise to ensure care is provided in a way that maintains children's safety, wellbeing and cultural safety is a critical duty of the Service.

Broadly, the Service has two areas of first aid administration—

- First aid facilities and equipment, and
- First aid expertise - qualified staff.

Fundamentally, the specifics of these requirements are created from a risk assessment (requirements assessment) procedure. In establishing the requirements of the Service, the implemented procedures are followed to ensure the content, design, accessibility and visibility of equipment is managed to a compliant and quality standard. These procedures will also consider cultural appropriateness and accessibility for all children and staff.

To reflect our commitment to children's safety and protection, the expectations for educators to hold approved qualifications exceed the regulated minimum standard. the Service recognise the importance of timeliness and availability to care and treatment when first aid is required and resource our service accordingly. We also acknowledge the importance of culturally responsive first aid practices.

For the purposes of first aid qualifications (including emergency asthma and anaphylaxis), 'approved' means qualifications set out in the NQF approved qualifications list (Regulation 137), completed within the relevant timeframes, with training outside of this list being seen as irrelevant. All evidence of a staff member's first aid qualifications will be kept on file, in their employee record.

Roles and Responsibilities

Approved Provider	• Will support employees to have access to regular training to exceed qualification requirements including training on culturally responsive first aid and trauma-informed care. • Ensure the service is stocked and has access to ample first aid supplies and equipment which are inclusive and consider diverse needs.
Nominated Supervisor	• Monitor established routines to ensure first aid supplies are stocked and available. • Coordinate training opportunities for educators ensuring all training incorporates child safety, wellbeing, and cultural safety principles. • Monitor staff qualifications and rostering requirements to ensure Educators are culturally competent and adequately trained. • Support responses to injuries and incidents, prioritising the child's holistic wellbeing.
All Staff	• Ensure personal first aid kits are restocked after use. • Respond to injuries and incidents in accordance with training and qualifications always prioritizing the child's safety, wellbeing, and cultural safety. • Report any identified issues with first aid management to the Nominated Supervisor for resolution, contributing to a culture of continuous improvement in child safety.

Key Tasks and Responsibilities

First Aid Facilities	The Approved Provider is responsible for ensuring the relevant analysis of first aid needs is carried out. The Nominated Supervisor is then responsible for ensuring the equipment needed is purchased and maintained by the service ensuring all facilities and equipment meet the highest standards for child safety and wellbeing and are culturally appropriate.
First Aid Information and Training	The Nominated Supervisor will maintain employee records for first aid qualification and coordinate any training needs. Educators are to submit relevant evidence of first aid qualifications and actively engage in professional development that enhances their understanding of child safety, wellbeing, and cultural safety in emergency situations.
Applying First Aid	Qualified first aid educators are to apply first aid as per training. Any educator who is not first aid trained is to alert the need for a first aid qualified educator to respond to an incident. The person treating any injuries must complete the relevant report, with the Nominated Supervisor or Responsible Person notifying parents/guardians ensuring transparent and culturally sensitive communication.

Procedures

First Aid Facilities

The Approved Provider recognises their responsibility to ensure the service's first aid kits are (Regulation 89) —

- of an appropriate number considering the number of children being educated and cared for by the service,
- suitably equipped, and
- easily recognisable and readily accessible to adults.

The Service is guided by the [First Aid in the Workplace Code of Practice 2021](#), to ensure the size and contents of first aid kits are relevant to the service context .

The Nominated Supervisor is supported to ensure the first aid supplies are well-stocked. Routine inspection of supplies occur weekly, and a comprehensive re-stock is completed at least each term. the Service is committed to ensure resources exceeds any identifiable needs. As well as a large comprehensive first aid kit located in the OSHC building, additional smaller kits are available to have on hand to take to outdoor or other areas regularly used by the Service (e.g., shared alternative spaces), ensuring accessibility and responsiveness to diverse activities and locations.

Risk assessments will be undertaken to identify the likelihood and adequate controls for relevant injuries and illnesses to the school age care context, such as burns, eye injuries and/or poisoning occurring. Where additional requirements are identified, the first aid supplies will be updated to include relevant items with consideration for specific vulnerabilities and cultural practices.

The Service will have at least one central first aid kit kept in the OSHC Office. The cupboard will be appropriately marked with a highly visible first aid signage. Educators will be shown the location of the first aid kit during induction ensuring all staff are aware of critical safety resources.

First Aid Information and Training

For the purposes of an educator being considered as currently first aid qualified, the educator will need to have completed an approved course of the following type, within the stated timeframes (Regulation 136). In this instance, "approved" means a qualification in line with the [NQF approved qualifications list](#).

First aid qualification	Life support training and cardiopulmonary resuscitation (CPR) training that forms part of the first aid qualification	1 year
	Any other training that forms part of the approved first aid qualification	3 years
Approved anaphylaxis management training		3 years
Approved emergency asthma management training		3 years

While the Service would typically exceed qualification requirements, the Approved Provider and Nominated Supervisor will ensure that, at least one educator with the required first aid qualification, and anaphylaxis management and emergency asthma management training is in attendance and immediately available in an emergency, at all times children are being cared for. (e.g. if children go to an oval or park then a qualified first aid person must go with them). To ensure the service maintains compliance, any Nominated Supervisor or Responsible Person must maintain their relevant qualifications demonstrating a proactive approach to child safety and wellbeing.

Staff Records

The Service will retain evidence of all educator's first aid and emergency management qualifications, and a summary of this information will be maintained in the staff schedule.

Availability of Information

First aid information will be made accessible to educators, with a variety of resources and displays to be onsite. Additionally, educators will be supplied with pertinent information including verbal instruction and/or demonstrations, videos and posters during orientation and induction ensuring cultural appropriateness and accessibility of training materials.

Current information about specific risks in the workplace and any changes affecting the provision and use of first aid will be provided to educators on a regular basis, fostering continuous learning and adaptation in child safety practices.

Applying First Aid – Critical Incidents

Only suitably qualified educators are to apply first aid to children. All administration of first aid will be consistent with the level of training and competency of the educator's qualification. First aid provision will always be trauma-informed and culturally sensitive.

Any child who sustains (or suspected to have sustained) an injury will be attended to by a first-aid qualified educator, this may require an educator to seek the appropriate assistance.

Principles for Serious First Aid Incident

When a need is identified to give first aid, the person will ensure that ill or injured persons procedures for administering first aid will be in accordance with policy [2.4 Incident, Injury, Trauma and Illness](#). The educators should make sound judgement in treating incidents to—

- Preserve life as an immediate priority.
- Ensure the child is stabilised and comforted until medical help intervenes, including monitoring the ill or injured persons (where needed, in the recovery position) with a focus on the child's emotional wellbeing and cultural comfort.
- Ensure that the environment is safe and that other persons (especially children) are not in danger of becoming ill or injured.
- Seek support to assist in the care and response.

In the event a staff member is required to provide first aid, all other educators should immediately seek the support of their team members to ensure that supervision of children remains paramount. Educators should consider either an emergency evacuation or lockdown to ensure the safety of children, where circumstances are critical.

Emergency Services

Any incident or injury requiring greater care and treatment than first aid, an ambulance/emergency services (000) will be immediately called.

The following incidents are a non-exhaustive list of examples of where critical first aid is required:

- When an individual has stopped breathing or is choking,
- When an individual is unconscious or any serious head injury,
- Where there is deep cut with serious bleeding,
- Where there is a suspicion of anaphylaxis; or
- Where there is a significant injury (fracture, dislocation etc.).

It is expected that in the event of any injury, the person providing first aid will assess the situation and determine the need for an ambulance - in situations other than those listed below. Where in doubt, emergency services should always be called for support.

In the event that an ambulance is called:

- Families must be informed as soon as practicable that their child has required an ambulance (emergency first aid to be administered first) with clear and culturally appropriate communication,
- Management must be informed as soon as practicable that a child has required an ambulance (emergency first aid to be administered first),
- The Approved Provider will inform the Regulatory Authority within 24 hours that a child has required an ambulance,
- Staff/Educators are to accompany child in an ambulance in the absence of the parent/guardian where possible; and
- Families are required to pay any costs associated with the ambulance.
- Staff/Educators are to accompany child in an ambulance in the absence of the parent/guardian where possible; and
- Families are required to pay any costs associated with the ambulance.

Not all injuries will require additional medical treatment, children receiving minor first aid (e.g. ice-pack/adhesive strips), can be supported in an appropriate location at the service e.g. the office while being comforted and treated. Educators managing minor first aid incidents must make an entry in the first aid record book, located with the Service first aid kit. Information to be included in the first aid record book must include:

- The child's name,
- Time and date,
- What first aid was provided,
- The reason for the first aid to be administered,
- Where on the child it was applied; and
- Educator's name and signature.

The child's family should be notified as soon as practicable, which in some minor first aid incidents, may be upon collection at the end of the day/session ensuring transparency and maintaining family communication.

Treating Wounds – Minimise Cross Contamination

When treating open wounds, educators will—

- Remove required items to be used to manage first aid from the first aid kit.
- Place items in/on a non-contaminated dish or surface.
- Wash hands and use gloves before treating wounds.
- When cleaning wound with a sterile swab or other disinfectant, follow the relevant training and instructions.
- The used swab or like will be placed in a first aid waste bin for isolation and disposal.
- If changing the type of first aid activity, e.g. cleaning to bandaging, gloves will be changed and placed in the first aid waste bin.

Treating Suspected Concussion

Where an incident occurs and there is a suspicion of concussion, the child will be observed and monitored closely by a first aid qualified Educator to ensure there are no signs or symptoms of concussion. During monitoring, staff must be alert for signs of concussion, including but not limited to:

- Appearing unsettled
- Excessive drowsiness or attempting to fall asleep
- Vomiting

If any of these symptoms are observed, 000 will be contacted immediately, and the family notified that emergency services have been called.

Injury Reporting

Where first aid is applied because the child has sustained an injury, an [Incident, Injury, Trauma or Illness Report](#) must be completed. Parents/guardians must be notified of any injury as soon as practicable, but within 24 hours, ensuring timely and transparent communication with families.

For **serious incidents** (hospital/medical treatment needed or ought to have been needed) an additional notification to the Regulatory Authority is required as soon as practicable, but within 24 hours – see policy [2.4 Incident, Injury, Trauma and Illness](#) for these steps.

For information pertaining to the management of specific medical conditions, refer to policy [2.9 Medical Conditions in Children](#).

Incident, Injury, Trauma or Illness reports will be reviewed by the Nominated Supervisor on a periodic basis in order to identify areas or processes of the Service that are likely to give rise to injury or illness. Such periodic reviews will also be used to:

- Review safety procedures to prevent further problems,
- Implement safer and healthier work practices,
- Identify where first aid facilities and services are most needed, contributing to a culture of continuous improvement in child safety.

First Aid Waste Management

The Service acknowledges the need to manage first aid waste and corresponding biohazards to effectively prevent cross infection or contamination from waste materials which forms an important element of the whole first aid procedure. Such materials will include, but not be limited to protective adhesive strips, bandages, swabs, cotton buds/balls and ice packs.

A clearly labelled first aid waste bin will be supplied and maintained in the following way:

- Fitted with a bag that can be sealed and removed each day (if required);
- Cleaned and sanitised daily (if required); and
- Located in a suitable place that is not readily accessible to children.

Any material used, including gloves and packaging will be properly disposed. The location where first aid was administered will be inspected for any remaining biohazards (body fluid, waste). If needed, the area will be blocked off while relevant cleaning and sanitisation occurs.

Educators will thoroughly wash hands using specified hand washing procedures before and after implementing first aid and they are to wear disposable gloves to manage incidents of first aid involving waste materials as identified.

When conducting first aid, educators will:

- Remove required items to be used to manage first aid from the first aid kit,
- Place items in/on a non-contaminated dish or surface,
- Clean the injured area of the person using principles of first aid as per this policy and training e.g. wiped with sterile swab etc,
- The used swab will be placed in the lined first aid waste bin; and
- Change gloves if changing the type of activity they are managing with first aid e.g. cleaning to bandaging. These gloves should also be placed in the first aid waste bin, adhering to rigorous hygiene standards to ensure safety and wellbeing.

Injuries to Employees or Visitors

Any employee (or other adult) injuries will follow steps outlined in this procedure. Any injury requiring medical treatment will be managed in collaboration with the Nominated Supervisor or Responsible Person.

Just as expected with children, where an injury requires greater response than first aid, an ambulance will be called.

Documentation of educator or visitor injuries will be recorded on the appropriate form. Reporting to Work Health Safety Queensland (WHSQ) may be required where an incident reaches a notifiable threshold. Details of reporting requirements and methods can be found on the WHSQ website, ensuring a safe environment for everyone within the Service.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Regulations:**
 - R.89 First aid kits
 - R.86 Notification to parents of incident, injury, trauma and illness
 - R.87 Incident, injury, trauma and illness record
 - R.136 First aid qualifications
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.174 Time to notify certain circumstances to Regulatory Authority
 - R.183 Storage of records and other documents
- **National Quality Standard**
 - QA2 – Children's health and safety
 - QA4 – Staffing arrangements

Additional Regulatory Context and Guidance

- [Work Health and Safety Act 2011](#)
- [Privacy Act 1988 \(Cth\)/ Information Privacy Act 2009 \(Qld\)](#)
- [First Aid in the Workplace Code of Practice](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[2.4 Incident, Injury, Trauma and Illness](#)

[2.7 Infectious Diseases](#)

[2.8 Hygiene, Health and Wellbeing Practices](#)

[2.9 Medical Conditions in Children](#)

[2.10 Administration of Medication](#)

[2.13 Emergency Evacuation, Lockdown and Drills](#)

[6.4 Acceptance and Refusal of Authorisations](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.7 Managing Notifications](#)

Policy 2.5 Administration of First Aid		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Address regulatory changes		
V1-06.2024 – no updates		
V1-03.2025 – no updates		
V2-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, removed first aid kit contents table, enhanced key tasks and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – enhanced procedures relevant to treating suspected concussion		

2.6 Water Safety

Policy Statement

Approved Provider acknowledges that water activities are a significant part of both our Queensland culture and typical leisure activities for children. The Service has an opportunity to include water activities as part of the program to promote health, play and leisure, while prioritising child safety, wellbeing and cultural safety. The procedures contained in this policy are designed to address the inherent risks associated with swimming and water-based activities.

The Service recognises that the safety and wellbeing of children in and around water is of the highest priority, with effective, culturally sensitive supervision being a key determinate of safety. Throughout all water activities, children will be closely supervised. Likewise, comprehensive risk assessment and planning, developed with a child-rights approach, will be fundamental to ensure the environment and systems to protect children are adequate.

To remove any doubt, the scope of this policy includes swimming activities, water play and excursions in or near water. The safe consumption of water is addressed in policy [1.6 Food and Nutrition](#).

Roles and Responsibilities

Approved Provider	• Ensure policy and procedures support the safety and wellbeing of children. • Ensure risk-assessments identify and manage risks associated with any water hazards and water-based activities including potential impacts on children's cultural safety and emotional wellbeing. • Review and approve excursion, incursion and regular outing risk assessments that may include water based activities with a critical lens on child safety and cultural considerations.
Nominated Supervisor	• Provide information and guidance to educators and families on the importance of children's safety in and around water including culturally appropriate water safety messages. • Ensure water hazards and water play are always highly supervised with a focus on active, vigilant supervision that is responsive to individual child needs and cultural backgrounds. • Conduct comprehensive risk assessments that identify and assess risks associated with any water hazards and prior to any water activities taking place. • Ensure the risk assessment identifies the educator to child ratios required to ensure children's safety and will explicitly consider factors that promote cultural safety and inclusion for all children. • Ensure a copy of risk assessments including water activities are provided to the Approved Provider no less than 2 weeks prior to the excursion date occurring. • Ensure opportunities for children to access water or pooled water during excursions and regular outings are considered and dynamically risk assessed to minimise foreseeable risks, prioritising child safety and wellbeing in all environments. • Ensure indoor, yard and equipment safety checks identify pooled water and any other relevant water hazards • Ensure parents of OSHC children attending a swimming activity excursion are informed of the swimming details and risks involved and provide written consent for the activity with clear, accessible, and culturally appropriate communication. • Incorporate water safety awareness into the educational program, making it engaging and culturally relevant for all children. • Ensure all parents/guardians have indicated the swimming ability of their children before participating in the excursion to inform tailored supervision plans where necessary.

All Staff	• Encourage children to play in or near water safely, giving appropriate instructions and guidance respecting diverse cultural understandings of water and safety. • Provide active supervision when children are participating in water activities, maintaining constant vigilance and awareness of individual child needs. • Understand and be willing to act in accordance with the relevant risk-assessment, demonstrating a commitment to child safety. • Conduct daily safety inspections of the service premises to ensure that all water hazards are known and minimised and contributing to a safe physical environment.
Families	• Be aware of risk assessments relating to any pooled water activity or swimming activity excursions • Provide written consent for your child/ren to participate in the pooled water activity or swimming activity excursions. • Provide accurate information about the swimming ability of their child/ren attending a swimming activity excursion as part of the booking process and before participating in the excursion to enable the Service to implement appropriate safety measures.

Key Tasks and Responsibilities

Risk Assessment	The Nominated Supervisor will be responsible for developing the relevant risk assessment that must be endorsed by the Approved Provider. The Nominated Supervisor will also be responsible for the collection of authorisations and swimming ability information, ensuring these processes are conducted with cultural sensitivity and a focus on maximizing child safety and wellbeing.
Water Activities Supervision	The Nominated Supervisor is responsible for developing a suitable supervision plan for the activity and educators are responsible for collectively working together to follow these instructions, including sun safety, ensuring consistent, active, and culturally informed supervision practices that prioritise every child's safety and enjoyment.

Procedures

Identifying Hazards and Assessing Risk

The National Regulations make reference to 'water hazards' however the term is not expressly defined. In this policy, a water hazard is defined as anything that can hold 5cm of water and fit a child's nose and mouth and a 'water hazard' may include:

- large bodies of water such as dams, creeks, river or pooling water, swimming pool, portable pools and spas, jetted bathtubs (or Jacuzzis)
- fishponds
- smaller bodies of water such as baths, mop buckets
- sinks, basins
- water features, such as a wishing well
- containers for feeding animals
- water troughs, containers for paddling- clam shells
- beach

Generally speaking, the Service's premises will be free from water hazards.

Educators will ensure water troughs or containers for water play are filled to a safe level and emptied onto garden areas after use. Water troughs should not be used without a stand to keep it off the ground and children should remain standing on the ground whilst using the water trough.

Buckets of water used for cleaning are emptied immediately after use and buckets are not to be left in play areas or accessible to children unless they are being used as part of a program experience.

Children may have access to hot water during service operations and through participating in activities. Accessible hot water will be maintained at an appropriate temperature (43.5°C or less) to prevent scalding and ensure a safe environment. Educators, students or visitors will not have hot drinks near children, reinforcing a vigilant approach to safety in all areas.

Ensure fish tanks and water features that are not able to be adequately supervised at all times and/or pose an unacceptable risk to children are guarded or effective barriers are in place.

A daily safety inspection of the premises will be conducted to ensure that all water hazards are known and minimised. When a water hazard or potential water hazard is detected, educators will complete a risk assessment to address any concerns and children will be excluded from the area until the hazard has been rectified, demonstrating proactive risk management.

Practices for Other Non-Swimming Water Activities

While non-swimming water activities are far less likely to contain the same level of drowning risks, consideration will be given to any relevant hazards. Should an activity present with increased risk to health and safety, a risk assessment will be created and followed, ensuring that all water-based activities, regardless of perceived risk, are subject to thorough safety planning and culturally sensitive implementation.

Specific Practices for Swimming Activities

Refer policy [1.4 Excursions, Incursions and Regular Outings](#) for ratio requirements relating to swimming activities.

The choice to and where swimming will occur will be considered through an assessment of The Service's capacity to ensure the activity can be carried out safely. All bodies of water present a significant risk to children therefore, the implementation of swimming activities will also ensure the following procedures are followed, prioritising child safety and wellbeing above all else.

Risk Assessment and Supervision

A comprehensive risk assessment of the swimming venue and activity will be conducted to determine the required educator to child ratio and skills/qualifications required. A plan for supervision in and out of the water will also be developed. It is expected that during the swimming activity educators will be positioned both in and out of the water to promote a complete, coordinated and active level of supervision of children in and around the pool area, ensuring constant and effective supervision to safeguard children.

The Service will also consider the needs for first aid and CPR trained educators beyond the minimum regulation requirements, demonstrating an enhanced commitment to child safety.

Educators will ensure water hazards and water play are always highly supervised including:

- direct and constant monitoring of children,
- careful and intentional positioning of educators,
- scanning and moving around the environment,
- observing play and anticipating behaviour,
- ensuring higher adult to child ratios (where relevant),
- ensuring no child is left unattended when in proximity to water, reinforcing continuous and vigilant supervision.

Understanding Children's Ability

Parents/guardians must complete a 'Swimming Ability Form' for each child attending a swimming activity. Information gained through this form will identify children's swimming competence and assist educators to manage their safety while in the water:

- The swimming ability form will direct the supervision, support and depth of water the children will access throughout the activity.
- Parents/guardians will be informed of any practices to support the safety of children as a result of their ability, ensuring transparent communication and individualised safety plans where necessary.

To remove any doubt, the Service will ensure children requiring any additional support are considered. The Service will collaborate with parents/guardians to address specific support plans, where relevant. Swimming will not occur unless it can be carried out safely, upholding the principle that child safety and wellbeing are paramount, and respecting individual needs and cultural considerations in activity participation.

Safety Equipment and Inspection of environment

Consideration will also be given to the capacity of educators to rescue children from water and any relevant equipment required. A list of required items will be created within the risk assessment. On the day of the swimming activity a suitably experienced educator will inspect all listed safety equipment and the pool area to ensure all required elements are available and in good repair, demonstrating thorough preparation for child safety.

Sun Safety

The Services' Sun Safety policy will be followed throughout. This includes the use of sunscreen and sun-safe swimwear. Educators will role-model the same expectations promoting healthy habits and responsible outdoor play.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
 - s.165 Offence to inadequately supervise children
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.89 First aid kits
 - R.90 Medical conditions policy
 - R.97 Emergency and evacuation procedures
 - R.98 Telephone or other communication equipment
 - R.99 Children leaving the education and care service premises
 - R.100 Risk assessment must be conducted before excursion
 - R.101 Conduct of risk assessment for excursion
 - R.102 Authorisation for excursions
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.172 Notification of change to policies or procedures
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety
 - QA3 – Physical environment

Additional Regulatory Context and Guidance

- [Work Health and Safety Act 2011](#)
- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Managing risks at publicly accessible pools - Information guide for owners, operators and controllers of public swimming pools](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[1.1 Educational Program Development and Implementation](#)

[1.4 Excursions, Incursions and Regular Outings](#)

[2.1 Providing a Child Safe Environment](#)

[2.2 Supervision and Educator Ratios](#)

[2.4 Incident, Injury, Trauma and Illness](#)

[2.5 Administration of First Aid](#)

[2.9 Medical Conditions in Children](#)

[2.11 Sun Safety](#)

[3.5 Emergency and Safety Equipment](#)

[6.4 Acceptance and Refusal of Authorisations](#)

Forms and Resources

[Swimming Ability Form](#)

Policy 2.6 Water Safety		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – no updates		
V2-03.2025 – Added information for all roles and responsibilities and added families, additional procedures relevant to identifying hazards and assessing risk and risk assessment and supervision.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced key tasks and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards.		
V3-04.2026 – No updates		

2.7 Infectious Diseases

Policy Statement

The purpose of this policy is to establish guidelines for preventing and controlling the spread of infectious diseases at the Service. We recognize that infectious diseases can pose a significant risk to the health and wellbeing of children, families, and staff, and therefore, we are committed to implementing effective measures to prevent and control the spread of infectious diseases in our service.

Limiting the spread of infection is a shared responsibility – it requires parents/guardians to actively partner with the Service to isolate (exclude) children who are contagious to ensure they remain away from OSHC. Likewise, the service has duties to ensure the environment remains clean, healthy and culturally safe for all and parents/guardians are aware of any occurrences (to monitor for symptoms). Immunisation also has a strong role to play in limiting the spread of infection. The Service has created expectations for immunisation for this purpose, recognising its role in community health and collective child safety.

The Service may implement further strategies and protocols in accordance with relevant government health guidelines relevant to public health, including any pandemic response always prioritising the wellbeing and cultural safety of our children and community.

Roles and Responsibilities

Approved Provider	• Ensure the services is guided by robust, evidence-based, and culturally sensitive preventative and reactive measures to control infectious disease. • Support relevant reporting as required, maintaining transparency with health authorities and families.
Nominated Supervisor	• Proactively consult with families and the Approved Provider for cases of infectious disease acknowledging diverse cultural perspectives on health and wellbeing. • Report relevant information to Queensland Health as required ensuring compliance with public health directives. • Establish and foster a culture of good hygiene practices, providing clear, accessible, and culturally appropriate instruction to staff on techniques to reduce the possible spread of infection. • Provide comprehensive information to educators and staff about relevant immunisation guidelines for children and themselves, promoting a healthy and safe working and learning environment.
All Staff	• Inform the Nominated Supervisor of relevant illness (or infectious disease in their immediate household), demonstrating a commitment to collective health and safety. • Consistently model and actively supervise good hygiene practices making them an integral part of daily routines for children. • Monitor children for symptom of infectious disease, reporting as required and exercising vigilance for the wellbeing of all children. • Maintain appropriate health and safety procedures when treating ill children - wear disposable gloves, face mask or other PPE if needed, ensuring both their own and the child's protection.
Families	• Adhere to the Service's policies regarding Infectious Diseases, Immunisation and Sick Children and adhere to exclusion requirements, demonstrating a shared commitment to the health and safety of the entire service community. • Exclude their child from care if they display symptoms of an infectious illness or disease or in the event a vaccine preventable disease occurs at the service and their child is not fully immunised. • Advise the service of their child's immunisation status by providing approved written documentation for the service to copy and place in the child's file, ensuring accurate record-keeping and public health compliance.

Key Tasks and Responsibilities

Information Sharing	The Nominated Supervisor will be the primary contact for communicating the requirements of the service, including notifying any occurrences to parents/guardians to ensure clear, timely, and culturally sensitive information sharing.
Exclusion Requirements	Should a child be required to isolate from the service, the Nominated Supervisor or Responsible Person will communicate these requirements to the parents/guardians, providing necessary support and understanding for families.
Health and Hygiene Practices	All educators are to follow the service's health and hygiene practices, especially when carrying out tasks that may spread infection or illness, contributing to a safe and healthy environment for all children.

Procedures

Monitoring for and Responding to Occurrences of Infectious Disease

The Nominated Supervisor will ensure they keep up to date with information on infectious diseases within the community through accessing the Commonwealth Government Department of Health (see www.health.gov.au) and Queensland Health (www.health.qld.gov.au).

The current NHMRC resource 'Staying Healthy in Childcare' will be referred to when making decisions in regard to communicable diseases and/or exclusion periods. Fact sheets may also be accessed through Queensland Health website, ensuring our practices are always informed by the latest expert guidance.

Informing the Service of Infectious Disease

It is the responsibility of parents/guardians to inform the Nominated Supervisor of any infectious disease that their child, or other immediate family members may be suffering. Parents/guardians are advised through the enrolment process that children who are ill are not to be brought to the Service.

Notwithstanding the responsibilities of parents/guardians, the presentation of an illness may not commence in the home environment but during a session of care. Children becoming ill at the Service will be managed by the steps contained in policy [2.4 Incident, Injury, Trauma and Illness](#). Fundamentally, the Service cares for the child's wellbeing while the service limits any potential spread, including a request to collect the child.

It is the responsibility of educators to inform the Nominated Supervisor of any infectious disease that the staff member, or their other immediate family members, may be suffering. The Nominated Supervisor, Approved Provider and staff member will consult on risk and suitable management plans (including exclusion, if necessary). It is expected that an employee will not present to the workplace where there is a risk of spreading an infectious condition.

Notifications and Information Sharing

Parents/guardians

Parents/guardians will be advised through the enrolment procedures and the Family Handbook that children who are ill are not to be brought to the Service.

Where the Service has been informed of an instance of infectious disease being potentially exposed to children attending the service, the following will occur—

- A notice stating the occurrence will be displayed at the Service in a prominent location.
- The Nominated Supervisor (or relevant delegate) will send an email to all parents/guardians notifying of the occurrence, ensuring broad and timely awareness.

To remove any doubt, in the communication of the occurrence of an infectious disease, the privacy and confidentiality of the individuals involved will be strictly maintained. Parents/guardians will be informed of the symptoms and any treatments or relevant exclusion periods while respecting individual privacy.

Responding to Occurrences

The Nominated Supervisor is to use their professional judgement to inform the Approved Provider, via email or agreed method of communication, of any significant infectious disease occurrences reported to the Service. The Nominated Supervisor will also provide details of the service's response including relevant guidelines to prevent the spread of the infectious disease. The Approved Provider will express any additional action to be undertaken to ensure all reasonable steps have been followed, demonstrating a proactive and collaborative approach to health management.

Additional Reporting

Depending on the circumstances, the Service may be responsible for reporting to Queensland Health. The Nominated Supervisor will notify the Approved Provider when intending to report an infectious disease case to Queensland Health.

Depending on the seriousness and circumstance, the Nominated Supervisor may be required to follow procedures as set out in policy [2.4 Incident, Injury, Trauma and Illness](#) and report a notification to the Regulatory Authority, ensuring full compliance with reporting obligations for serious incidents.

Records of infectious disease will be compiled and retained by the Nominated Supervisor (refer policy [2.4 Incident, Injury, Trauma and Illness](#)). These records will include:

- Child's name,
- Child's age,
- Symptoms,
- Date and time when educators first noticed the illness,
- Date and time the record was written,
- What action was taken,
- Details of notification to parents/guardians.

This record will be stored confidentially (refer policy [7.6 Privacy and Confidentiality of Records](#)).

Exclusion Due to Occurrence of Infectious Disease

All people, including children and educators, who are suffering from any infectious diseases need to be excluded from the Service to prevent others from being introduced to the infection. When any such person is found to be showing signs of any infectious disease:

- For children, their parents/guardians will be asked to immediately collect their child and seek medical advice, prioritising the child's recovery and preventing further spread,
- For educators (or any other adult), they will immediately be released from work (or requested to leave) in order to seek immediate medical attention and not return for at least the period set out for the symptom/infectious disease, ensuring a healthy and safe environment for all,
- If a medical practitioner diagnoses an infectious disease, the child/educator will be excluded for the recommended period set out in the NHMRC guidelines or as otherwise advised.
- For diseases which are published as requiring a doctor's certificate clearing the child/educator, the doctor's certificate will be provided before the child/educator is re-admitted to the service.

Consistent with the NHMRC guidelines, people with the following symptoms must not attend the service for at least the relevant exclusion period (may be longer if multiple cases)-

Vomiting	24 hours without symptoms.
Diarrhoea	24 hours without symptoms (or 48 hours where confirmed norovirus).
Influenza and influenza-like illness	Until symptoms have resolved, normally 5–7 days.

Immunisation

All children must meet the Australian Federal Government's immunisation requirements or have a valid exemption for the family to be eligible for Child Care Subsidy (CCS). Parents/guardians will be asked to verify their child's immunisation status when they enrol, with a copy of relevant evidence potentially sighted.

While the Service will accept enrolments of children who are not immunised, children will be excluded from attending the service if there is an outbreak of an infectious disease against which they have not been immunised. Relevant cancellation periods and absences still apply (refer policy [7.10 Fees, Statement and Parent Gap Fee Payments](#)). The period of exclusion will be in accordance with the National Health and Medical Research Council's recommendations (refer policy [6.9 Childhood Immunisation](#)), balancing individual choices with the collective health and safety of all children in our care.

Employee Immunisation

Employees working in an OSHC setting are at an increased risk of contracting immune preventable diseases and other illness due to the nature of their work. Employees can be exposed to infectious diseases through contact with infected children and bodily fluids. Education and care staff need to be aware of the risks associated with working with children as well as appropriate preventative measures that will assist in providing a safe and healthy work environment for everyone.

It is the choice and responsibility of the individual employee to immunise themselves against illnesses. All employees and volunteers working with children in the Service are strongly encouraged to be up to date with all the vaccinations as recommended for adults contained within the [National Immunisation Program Schedule](#).

Queensland Health recommends people working with children to be vaccinated against –

- Influenza (up to date)
- Measles
- Mumps
- Rubella (German measles)
- Whooping cough (pertussis)
- Chickenpox (varicella)
- Hepatitis A

All employees should also consider having annual influenza vaccinations. Influenza is very infectious and can spread through the air by coughing and sneezing, as well as by hands, cups and other objects that have been in contact with an infected person's mouth or nose.

Additional vaccinations are recommended for special categories of employees:

- Hepatitis B - for employees who care for children with intellectual disabilities. (Although the risk is low, seek advice about hepatitis B immunisation if the children are not immunised. Immunisation of the children should be encouraged).

Employees who are pregnant or immunocompromised (i.e. have a weakened immune system) should seek advice from their doctor about vaccinations. Some vaccinations are not recommended during pregnancy, or if a person has a disease or is undergoing treatment that affects their immune system.

Where employees are unaware of their status they will be advised to visit a doctor and undergo appropriate testing for immunity levels of the relevant diseases

In cases where an employee is not immunised, additional procedures will be relevant should an outbreak of any vaccine-preventable disease occur in the workplace, this will include, but not be limited to:

- Exclusion from the workplace; and/or
- Restrictions as advised by the relevant health authority to protect the health and safety of children and other staff.



Staying-healthy-guide
lines 6th edition.pdf

Staying Healthy in Childcare

Hygiene Practices

The Service will ensure rigorous and culturally sensitive hygiene practices are routinely followed to prevent the spread of infectious disease. This includes consistent and thorough hand washing, covering any cuts or abrasions with a waterproof dressing, and the mandatory use of gloves for touching items/area containing bodily fluid/mucus to maintain a high standard of cleanliness and infection control, (refer policy [2.8 Hygiene, Health and Wellbeing Practices](#)).

General Pandemic

Infection control and prevention measures will be essential to keeping The Service operating, and all children and staff attending the service, safe and well. In the event of a pandemic, The Service will follow guidelines and as per the procedures of this policy.

Additional to procedures listed in this policy, in the event of a general pandemic The Service will ensure staff and parents/guardians know the protocols for dealing with the Infectious disease, including (but not limited to):

- Exclusion of sick children, staff and visitors who show signs of the disease and/or have been diagnosed with the disease.
- Reduce mixing of children/staff as per socialising distancing rules.
- Enhance personal hygiene for children, staff, parents/guardians and visitors.
 - Ensure liquid and paper towels are available in all bathrooms
 - Alcohol hand sanitizer/hand gel is made available to all staff, parents/guardians and visitors.
 - The OSHC room shall undergo extensive cleaning and disinfecting above and beyond any daily cleaning roster. This includes all room fixtures and children's play items.
 - Using the outdoor facilities more regularly.
 - Considering opening the windows and adjusting air conditioning to maximize ventilation.
 - Promoting strict hygiene protocols when preparing and serving food and cancel all cooking clubs involving children to minimise transmission risks and ensure the continued safety and wellbeing of our entire community.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.167 Offence relating to protection of children from harm and hazards
 - s.172 Offence to fail to display prescribed information
- **Education and Care Services National Regulations:**
 - R.77 Health, hygiene and safe food practices
 - R.85 Incident, injury, trauma and illness policies and procedures
 - R.86 Notification to parents of incident, injury, trauma and illness
 - R.88 Infectious diseases
 - R.103 Premises, furniture and equipment to be safe, clean and in good repair
 - R.104 Furniture, materials and equipment
 - R.160 Child enrolment records to be kept by approved provider and family day care educator
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed

- R.171 Policies and procedures to be kept available
- R.173 Prescribed information to be displayed
- **National Quality Standard:**
 - QA2 – Children's health and safety

Additional Regulatory Context and Guidance

- [A New Tax System \(Family Assistance Administration\) Act 1999](#)
- [Public Health Act 2005 \(Qld\)](#)
- [Work Health and Safety Act 2011](#)
- NHMRC - [Staying healthy: Preventing infectious diseases in early childhood education and care services.](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [2.1 Providing a Child Safe Environment](#)
- [2.4 Incident, Injury, Trauma and Illness](#)
- [2.5 Administration of First Aid](#)
- [2.8 Hygiene, Health and Wellbeing Practices](#)
- [2.9 Medical Conditions in Children](#)
- [6.9 Childhood Immunisation](#)
- [7.6 Privacy and Confidentiality of Records](#)
- [7.10 Fees, Statements and Parent Gap Fee Payments](#)

Forms and Resources

- [Incident, Injury, Illness or Trauma Report](#)

Policy 2.7 Infectious Diseases		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – no updates		
V2-03.2025 – Added information for all roles and responsibilities and added families, additional procedures relevant to employee immunisation and general pandemic, updated reference to Staying healthy in Childcare 6th Edition.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced key tasks and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

2.8 Hygiene, Health and Wellbeing Practices

Policy Statement

The Service is committed to upholding the health, wellbeing and cultural safety of all children through promoting quality hygiene practices and self-care skill development and is committed to fulfilling its obligations to provide a safe, healthy and culturally inclusive environment for both children and educators.

There's a shared understanding that the practices promoted and adopted by the Service directly impact the spread of infectious disease and other contagious conditions and the Approved Provider is committed to providing a safe and healthy environment for its children and educators. Additionally, Educators will actively encourage children to adopt sound hygiene practices empowering them to embed healthy behaviours for life.

The practices and procedures in this policy are comprehensive, but not exhaustive. Where additional recommendations from reputable sources offer further or alternative actions, then these will be adopted. The Service will always be guided by the most current and authoritative information and guidelines ensuring continuous improvement in our child safety practices.

Roles and Responsibilities

Approved Provider	• Ensure policies and procedures are developed and implemented to address matters related to the health, safety, wellbeing, and cultural safety of children at the Service (as per Regulation 168). • Establish sound hygiene, health and wellbeing practices to support the service and its users. • Ensure facilities and resources adequately and culturally appropriately meet the diverse needs of the service.
Nominated Supervisor	• Proactively collaborate and continuously review practices to ensure they consistently support the health, safety, wellbeing and cultural safety of all children and educators. • Consistently role-model and monitor the health and hygiene practices of educators and children. • Ensure adequate and consistent health and hygiene practices are implemented by all staff members and volunteers • Provide timely feedback and request support or management for any identified issues from the Approved Provider. • Ensure the required equipment and resources are easily accessible, culturally appropriate and readily available for use including liquid soap, running water, paper towel. • Ensure daily hygiene and infection control procedures in accordance with Staying Healthy: Preventing infectious diseases in early childhood education and care services are implemented • Display hand washing posters in the designated handwashing areas promoting accessible information for all ages • Ensure Educators receive training on safety, health and hygiene practices including cultural considerations, before commencement and annually thereafter.
All Staff	• Implement daily hygiene and infection control procedures to ensure all reasonable steps are taken to prevent the spread of infectious disease in accordance with Staying Healthy: Preventing infectious diseases in early childhood education and care services • Consistently role-model and actively support the health and hygiene practices of children. • Use incidental opportunities for support and teaching, enhancing the skills, knowledge and practices of self-care for children, empowering them to take ownership of their health.

	• Model correct handwashing techniques and ensure children wash their hands in accordance with the recognised handwashing procedure outlined in <i>Staying Healthy: Preventing infectious diseases in early childhood education and care services</i> • Advise the Nominated Supervisor/Responsible person if feeling unwell at any time • Immediately address any apparent issues of hygiene and health, demonstrating a proactive approach to cleanliness and safety.

Procedures

All educators are expected to consistently role-model the practices set out this procedure at all times. Educators play a crucial role in strategically prompting children to adopt practices at vital moments of the day, i.e. sneezing or coughing into an elbow or using a tissue at the appropriate moment. Educators will use these opportunities not just to maintain a hygienic environment, but to actively teach and embed healthy behaviours in children, fostering their long-term wellbeing.

Hygiene Practices

As an enduring protective measure, and consistent with the recommendations of 'Staying Healthy in Childcare', the service will implement rigorous and routine hygiene practices to prevent the spread of infectious disease. These practices include:

Effective Hand Hygiene

A very effective method to prevent the transmission of disease and illness is through effective hand hygiene. Washing hands with soap and water is the preferred method as it removes both dirt and germs/viruses from the hands. Where soap and water is not available, then alcohol-based hand rub (sanitiser) can be used as alternative (or in combination).

At the Service, we aim to comprehensively educate and consistently encourage children to wash their hands frequently and effectively which will help to reduce the incidence of infectious diseases, adhering to recognised guidelines provided in the most current version of *Staying Healthy: Preventing infectious diseases in early childhood education and care services*.

Facilities	• The Approved Provider will ensure adequate, accessible and culturally appropriate handwashing facilities are readily available for children and educators. • The Nominated Supervisor will manage supplies and resources. The service will ensure enough stock is kept on-site to replace items like soap and paper towel as needed. • Clear, engaging, and culturally inclusive signage will be displayed near the handwashing facilities to encourage effective handwashing behaviours.
Hand Washing Practices and Expectations	• Educators and children will wash and dry their hands with soap, water and disposable towel: ○ After handling, preparing, and eating of food. ○ Before and after administering first aid. ○ After toileting, handling of animals or other activities which could lead to the spread of infection. ○ After coughing, sneezing, or blowing their nose. ○ After contact with/cleaning of body fluids (blood, mucus, vomit, urine, faeces etc.). ○ After applying sunscreen • In the first instance, soap and running water is the preferred method to ensure clean hands. • Hand washing (scrubbing hands) should last at least 20 seconds. • Where possible, children will be supervised or otherwise monitored during handwashing to promote effective techniques and skills.

Hand Sanitisers	- Hand sanitisers will not typically replace soap and running water, however, in certain situations such as on excursions when soap and running water are not available a hand sanitiser may be used. - Hand sanitisers will only be available with direct adult supervision.

Using Alcohol Based Hand Gel

Alcohol based hand gels must be labelled and kept out of the reach of children and should only be used when soap and water are not available.

Educators will only use an alcohol-based hand rub if their hands or the child's hands are not visibly dirty and ensure the hand rub only contains 60–80% alcohol.

There are three steps to using alcohol-based hand rub:

1. Apply the amount of hand rub recommended by the manufacturer to the palms of dry hands.
2. Rub hands together, making sure you cover in between fingers, around thumbs, and under nails.
3. Rub until hands are dry.

Personal Hygiene

General hygiene practices, which are both courteous and effective in limiting the spread of illness, will be modelled by educators and actively promoted among children. These include:

- Everyone (children and educators) should cover their mouth and nose with a tissue, their sleeve or a flexed elbow when coughing or sneezing.
- Children will be reminded to avoid touching their eyes, nose or mouth.
- Children who become unwell will be immediately and respectfully isolated from other children, while the parent/guardian is called to collect them, prioritising the wellbeing of the unwell child and preventing further transmission.

Transfer of Body Fluids

When dealing with a case of an infectious or communicable disease Educators will follow strict health and hygiene protocols. In the event of a transfer of bodily fluids to a persons skins, eyes or mouth, the first aider will wash/rinse the area with soap and water, saline or alcohol-free mouthwash.

Cleaning Nasal Discharge

Educators wiping the nose of a child will ensure they wash their hands (or use hand sanitiser rub) after each time and dispose of the dirty tissues immediately. Ideally, Educators should encourage children to wipe their own nose and wash their hands afterwards fostering independence and self-care skills.

Personal Protective Equipment (PPE)

Gloves	- Gloves will be used— - When coming into contact with bodily fluids (e.g. blood, mucus, faeces etc.). - Food preparation. - Cleaning activities. - Used gloves are to be disposed of immediately after use and will be inaccessible to children. - Educators will thoroughly wash their hands once gloves are removed.
Masks	- Masks will only be required when stipulated by a relevant public health directive. - However, masks can be worn (and are made available) for children and educators who wish to wear them, supporting individual choice and comfort while adhering to public health guidelines.

Health and Wellbeing Practices

During times of hot weather, educators and children will be encouraged to follow the service's Sun Safety Policy by wearing sun smart clothing, a broad brimmed hat and applying sunscreen, promoting healthy outdoor practices.

Additional practices for monitoring children's health and wellbeing during periods of extremely hot weather include:

- Encouraging the drinking of fluids more frequently throughout the session, particularly cold water to prevent dehydration.
- Keeping cool by wrapping a bandana or washer around their neck or using a mist bottle to spray themselves,
- Staying indoors, preferably in an air-conditioned or well-ventilated building with fans and open windows,
- Limiting strenuous outdoor activities by conducting games and activities indoors or in shaded areas outdoors, prioritising children's physical comfort and safety.

Ear Care

Children will be encouraged to consider their own ear health through engaging discussions with educators on issues relating to their ears such as cleaning, noise, water and infections.

Dental Health

The Service will ensure parents/guardians and children are provided with appropriate, consistent and up to-date information on the development and maintenance of good oral health by:

- Providing information on dental health and hygiene through appropriate pamphlets in the sign in area, newsletters, posters and/or web links
- Providing food and drinks with consideration to the sugar content and ensure water is available at routine mealtimes,
- Encouraging fruit and vegetable consumption,
- Accessing dental health and hygiene services/programs to utilize within the Service program,
- Providing resources to support dental health learning such as books, posters, 'giant' teeth and toothbrushes, to make learning engaging and impactful.

During vacation care families will be encouraged to provide food choices that support dental health and limit the provision of sweet foods and sports drinks to reinforce healthy dietary habits

Head Lice

Head lice cause concern and frustration for families, educators and children. Although head lice are not considered a health hazard, and do not spread disease, infestations can cause anxiety for all stakeholders.

To help prevent the spread of head lice, the Service will:

- remind parents/guardians to be vigilant in checking for head lice on a regular basis,
- confidentially and respectfully notify the parent/guardian of a child who is suspected of having live head lice and request that the child is treated, and all lice are dead, before returning to the Service the following day. This communication will be culturally sensitive and non-judgmental,
- keep parents/guardians informed if there is an outbreak of head lice at the Service, ensuring confidentiality is not breached by disclosing personal information,
- support parents/guardians and children who have head lice by providing factual, accessible and culturally appropriate information, reducing parental anxiety and ensuring no individual child is singled out or stigmatised due to head lice.

Environment

Hygiene and Health Promotion

Signs and posters will be strategically placed around the service to alert children to the need for and the steps to follow for effective hand hygiene.

Educators will endeavour to observe children's practices when washing hands and any relevant activities to support hygiene. Educators will provide verbal reminders of effective procedures to follow, fostering a culture of self-responsibility and health awareness.

Service Cleanliness

Work health and safety practices, including daily routines and checklists will support the service's commitment to maintain a hygienic and clean environment for children and others. Routine cleaning and disinfecting includes:

- The kitchen environment.

- Frequently touched surfaces (e.g. door handles).
- Toilet facilities.

This will additionally be supported by:

- Ensuring all toys, dress-up clothes, paint shirts and other materials and resources are routinely maintained to be clean and functional. Where possible, these will be washed with disinfectants.
- Tables, benches, floor surfaces and toilets will be cleaned daily and sanitised as required.
- The kitchen and eating areas will be cleaned and swept before and after each session.
- The refrigerator and pantry area will be cleaned weekly.
- The premises will be routinely treated for the control of pests.
- All personnel will ensure that contaminated items (e.g. tissues) are disposed of immediately after use.
- There will be suitable bins available for waste disposal. These are emptied daily.
- Recycled items (e.g. toilet rolls for craft activities) will not be used if they were or may have been used in a non-hygienic environment.
- There will be suitable disposal facilities for first aid waste.
- There will be suitable facilities for the storage of soiled clothing. Soiled clothing will be placed inside a plastic bag and sealed. Soiled clothing will be returned to the family when the child is collected.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.167 Offence relating to protection of children from harm and hazards
 - s.172 Offence to fail to display prescribed information
- **Education and Care Services National Regulations:**
 - R.77 Health, hygiene and safe food practices
 - R.85 Incident, injury, trauma and illness policies and procedures
 - R.86 Notification to parents of incident, injury, trauma and illness
 - R.88 Infectious diseases
 - R.103 Premises, furniture and equipment to be safe, clean and in good repair
 - R.104 Furniture, materials and equipment
 - R.160 Child enrolment records to be kept by approved provider and family day care educator
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.173 Prescribed information to be displayed
- **National Quality Standard:**
 - QA2 – Children's health and safety

Additional Regulatory Context and Guidance

- [A New Tax System \(Family Assistance Administration\) Act 1999](#)
- [Public Health Act 2005 \(Qld\)](#)
- [Work Health and Safety Act 2011](#)
- NHMRC - [Staying healthy: Preventing infectious diseases in early childhood education and care services.](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [2.1 Providing a Child Safe Environment](#)
- [2.4 Incident, Injury, Trauma and Illness](#)
- [2.7 Infectious Diseases](#)
- [7.12 Workplace Health and Safety](#)

Forms and Resources

[Indoor Safety Checklist](#)

[Outdoor Safety Checklist](#)

Policy 2.8 Hygiene, Health and Wellbeing Practices		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – no updates		
V2-03.2025 – Added information for all roles and responsibilities, additional procedures relevant to using alcohol based hand gel.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

2.9 Medical Conditions in Children

Policy Statement

The Service recognises that many children attending have specific health needs and medical conditions including asthma, diabetes and a risk of anaphylaxis and we are committed to proactively planning and implementing robust practices to ensure their health, safety and wellbeing are cared for. This policy outlines our commitment to a planned and responsive approach to managing medical conditions which meets all legislative compliance and aligns with child safe practices.

The Service understands some children have highly sensitive and potentially life-threatening conditions and the effective management and responsiveness of these medical needs are a critical aspect of their care and our duty of care. For all children with additional health needs or relevant medical conditions, we will ensure that:

- A comprehensive Medical Management Plan is provided by their medical practitioner and is easily accessible to staff.
- A Risk Minimisation Plan is developed in collaboration with families to identify and address risks in our environment.
- A Communication Plan is embedded within these plans to ensure all staff are informed and to provide clear protocols for updating information and actions.

The Service is committed to ensuring our educators are equipped with the knowledge, skills and confidence to support children's medical needs. The Approved Provider will seek to ensure all children in attendance receive the highest level of care and protection. Where relevant, additional training, resources and knowledge will be provided to educators to support the practices of the Service to attend to relevant health and medical needs.

Definitions

Children's medical needs may be broadly categorized into:

Short-term – which may affect their participation in activities while they are on a course of medication. Short-term medical needs are typically an illness that the child will recover from in a short period (e.g. tonsillitis, chest infection, etc.)

Long-term - potentially limiting their participation and requiring extra care and support. Long term medical needs are typically ongoing (e.g., asthma, diabetes, anaphylaxis, celiac disease)

Roles and Responsibilities

Approved Provider	• The enrolment form requests authorisation for parents/guardians or authorised nominees to authorise emergency medical treatment for their child to ensure rapid response in critical situations. • Ensure a Medical Risk Minimisation and Communication Plan is developed in respectful and proactive consultation with the child's family. • At least one staff member or nominated supervisor is in attendance at all times with a current accredited first aid certificate, emergency asthma management and emergency anaphylaxis management certificate (as approved by ACECQA) • Ensure staff are equipped to respond to children medical needs through collecting relevant information, obtaining medical plans, accessing relevant training. • Ensure parents/guardians receive relevant information and collaboration in managing children's needs. • Ensure all medical records are stored and maintained in a secure and confidential manner (medication records, illness, accident and injury records, incident reports etc). • Ensure information regarding the health and wellbeing of a child or staff member is not shared with others unless consent is provided in writing, or provided the disclosure is required or authorised by law under relevant state/territory legislation, upholding strict confidentiality.

	• Ensure the Incident, Injury, Trauma and Illness Record is completed in its entirety.
Nominated Supervisor	• All enrolment forms are reviewed to identify any specific health care need, allergy or medical condition. • Check all authorisations are completed and signed prior to children attending or commencing care. • Develop a Medical Risk Minimisation and Communication Plan in consultation with the child's family, fostering a partnership approach to safety and wellbeing. • Ensure specific medical needs of children are collected, planned and communicated effectively. • Ensure parents/guardians who indicate children with medical needs are informed of the service's obligations and their duties. • Will not enrol or allow any child to attend the service without a current, signed medical management plan and any prescribed medication from their medical practitioner. • Maintain a current register of children with a Medical Management Plan • Respond to medical needs as required to uphold the safety of children attending the service. • Provide new staff members with induction and ongoing training to assist in the management of children's medical conditions, ensuring all staff are competent and confident. • Ensure staff are suitably trained and instructed on the management of specific medical conditions. • Ensure at least one staff member or nominated supervisor is in attendance at all times with a current accredited first aid certificate, emergency asthma management and emergency anaphylaxis management certificate (as approved by ACECQA) • Ensure information regarding the health and wellbeing of a child or staff member is not shared with others unless consent is provided in writing, or provided the disclosure is required or authorised by law under relevant state/territory legislation, maintaining strict confidentiality. • Ensure any received updates in relation to the child, including Medical Management Plans are communicated to educators within 24 hours. The record will be placed on the child's file. • Maintain all medical records in a secure and confidential manner (medication records, illness, accident and injury records, incident reports etc). • Ensure the Incident, Injury, Trauma and Illness Record is completed in its entirety • Notify the regulatory authority (within 24 hours) in the event of a serious incident.
All Staff	• Have a clear understanding of children's individual health care needs, allergy or relevant medical condition that may be ongoing or acute/short term in nature • In the event that a high-risk scenario where a child suffers from a reaction, incident, situation, or event related to a medical condition, staff will immediately follow the child's emergency medical management plan as per Regulation 90(1)(c)(ii) • Know and understand where to locate children's emergency life saving medication if required. • Respond to the medical needs of children. • If medication has been administered, it is recorded in the <i>Authorisation to Administer Medication Form</i>, signed by the administering Educator and signed as witnessed by another educator. • Communicate relevant information to parents/guardians and children as required fostering open and honest communication.

Families	• Ensure the service enrolment form is completed in its entirety providing specific details about the child's medical condition • Provide management with information about their child's health needs, allergies, medical conditions, and medication requirements on the enrolment form and through verbal communication/meetings • Provide the service with a current and signed medical management plan for their child before enrolment is finalised. • Provide written consent for their child's medical management plan to be displayed in the service (in a discreet yet accessible location). • Supply children's life-saving medication which may include asthma puffers and EpiPens. • Provide adequate supplies of the child's medication directly to the service (do not leave in child's bag), ensure child's medication is present with the child at ALL times, within expiry dates and in the original container • Engage with the service daily to discuss your child's health and wellbeing, fostering a strong collaborative partnership. • Notify the service, verbally when children are taking any short-term medications AND whether or not these medications may be self-administered. • Sign all required medication administering or other health and/or medical documentation on collection. • The parent/guardian or authorised nominee MUST • Ensure any changes to children's information or status is communicated promptly to the service • Contribute to the development of Medical Risk Minimisation and Communication Plans for each child with specific medical conditions • Ensure Management Plans are up to date at all times and communicated to the service.

Key Tasks and Responsibilities

Development and Coordination of Plans	The Nominated Supervisor is responsible for liaising with parents/guardians to obtain and create the required plans to support a child with a relevant medical or health need, ensuring all plans are current, accurate, and culturally sensitive.
Management of Conditions	The Approved Provider is to ensure the practices required for the management of specific health conditions is set out in policy. The Nominated Supervisor is to ensure these practices are communicated to educators during their induction, fostering a culture of preparedness and competence.
Self-medication	All educators are to support children who self-administer medication and notify the Nominated Supervisor or Responsible Person, so the relevant records can be completed.

Procedures

The procedures to manage children's medical conditions are contained within the following documents:

- Individualised medical needs and planning—
 - Management/action plans,
 - Risk-minimisation plans, and
 - Communication plans.
- Practices for the Management of Specific Medical Conditions
 - Asthma Management Practices
 - Managing Children at Risk of Anaphylaxis
 - Diabetes Management Practices
 - Managing Epilepsy and Identifying Symptoms
- Self-administering of Medication

In addition, a notice will be displayed prominently in the main entrance of the service stating that a child diagnosed at risk of anaphylaxis is being cared for or educated at the service, and providing details of the allergen/s (as per regulation 173), ensuring all staff, visitors, and families are aware of the risk.

Individualised Health and Medical Need and Planning

As set out by Regulation 90, any child enrolled in the Service who has been identified with a health need, allergy or relevant medical condition will require:

- A **medical management plan** to be supplied by the parent/guardian,
- The development of a **risk-minimisation plan** in consultation with a parent/guardian; and
- The development of a **communication plan** (for staff members to be informed of the health and medical needs of children and for parents/guardians to understand how to update health/medical information and/or relevant plans).

Requirements for Medical Plans

The Service's enrolment forms will outline a child's medical needs. Where the parent/guardian indicates a child has an additional medical need, the Nominated Supervisor will communicate with the family to confirm the requirement for medical plans (management/action plan, risk-minimisation and communication plan). A parent/guardian may notify the Service at any time to update the service of a child's medical or health needs, which may also trigger the requirement of medical plans. Relevant health or medical needs, includes but is not limited to:

one of the following conditions:

- asthma,
- diabetes
- diagnosed at risk of anaphylaxis
- epilepsy
- any allergy or health care need requiring
 - specific action to be taken during an incident
 - the development of a risk-minimisation plan
 - relating to food safe handling, preparation, and consumption

The Nominated Supervisor will liaise with parents/guardians to understand specific circumstances and navigate the Service's requirements for medical plans, ensuring a collaborative and sensitive process.

Supply and Development of Medical Management Plans

Except for the management/action plan (that is supplied by the parent/guardian), all other plans are prepared by the Service in collaboration with parents/guardians. Parents/guardians of children with relevant medical or health needs are strongly encouraged to be actively involved in the development and contents of these important documents.

Plan Type	Details and Requirements
Medical Management (or action) Plans	• The purpose of these plans is to set out the information that signals symptoms of the medical condition and health need and the actions must be followed in the event of an incident relating to the child. • Unless there are extenuating circumstances, the medical management plan should be developed by the child's registered medical practitioner, ideally using specialist templates. • At minimum the management/action plan should include the following: ○ A photo of the child. ○ Details of the specific health care need, allergy or relevant medical condition including the severity of the condition. ○ Any current medication prescribed for the child. ○ What may trigger the allergy or medical condition (if relevant). ○ Signs and symptoms to be aware of as well as the response required from the service in relation to the emergence of symptoms. ○ Any treatment/medication required to be administered in an emergency.

	○ The response required if the child does not respond to initial treatment. ○ When to call an ambulance for assistance. ○ Contact details of the doctor who signed the plan.
Risk Management Plans	● These plans are developed by the service, in consultation with parents/guardians of the child. ● The service will use standardised templates to ensure all information is addressed. ● All risk-minimisation plans are to ensure: ○ the risks relating to the child's specific health care need, allergy or relevant medical condition are assessed and minimised. ○ if relevant, include measures to address the safe handling, preparation, consumption, and service of food. ○ if relevant, the parents/guardians are notified, through this documentation, of any known allergens that pose a risk to a child and strategies for minimising the risk. ○ to ensure all staff members and volunteers can identify the child, the child's management plan and the location of the child's medication. ○ if relevant, the child does not attend the service without medication prescribed by the child's medical practitioner for the condition.
Communication Plans	● Typically, embedded within the risk-minimisation plan, the communication plan sets out the practices for — ○ staff and visitors will be aware of relevant risks and plans to support the child's condition (including the location of the management/action plan). ○ parents/guardians to update any relevant details regarding a child's medical condition or particular of the medical plans.

Communication and Collaboration

Copy of Policy Provided (Regulation 91)

Parents/guardians will be provided with copies of the *medical risk-minimisation plan* and asked to formally approve it. A copy of this policy will be attached to each *medical risk-minimisation and communication plan*. These records will be stored securely with the child's enrolment forms.

Communication of Plans and Policies

Medical Management Plans are located in the OSHC office. All staff are shown the specific location during induction and are given opportunity to read and understand the content of each plan. The specific location of plans will be made with the agreement of parents/guardians, ensuring it is discreet from public view but easily and immediately accessible for all educators.

In addition, any children enrolled with medical needs are communicated to staff in team meetings and daily communication. The Nominated Supervisor is responsible for ensuring all educators, other staff and volunteers are able to identify a child with a specific health care need, allergy or other relevant medical condition and be able to locate their information, plans and medication/s easily and immediately.

Risk-Minimisation Plans will be stored with enrolment forms. All risk-minimisation plans will be communicated with staff. Educators will be asked to read and acknowledge their understanding of the risk-minimisation plan. This documents the communication and their subsequent understanding of what is required to keep the child safe.

Casual and/or agency staff are thoroughly informed of all children and staff members who have specific medical conditions, food allergies, the type of condition or allergies they have, and the service's specific procedures for dealing with emergencies involving allergies and anaphylaxis.

Practices for the Management of Specific Medical Conditions (*Regulation 90(1)(b)*)

Comprehensive induction and instruction of this policy will be provided to every staff member or volunteer engaged at the service. Each person must formally acknowledge they have been trained, have read the policy and fully understand the practices required to support children's health and medical needs.

Individual children's relevant health needs and corresponding plans will be discussed on a regular basis with all educators at team meetings to ensure staff have sound and up-to-date knowledge of practices and emergency management actions to maintain a high level of preparedness.

The Service will ensure that at least one educator with a current first-aid and CPR qualification, anaphylaxis management and emergency asthma management training is in attendance at any place children are being cared for, and immediately available in an emergency, at all times that children are being cared for by the service. The Service is committed to exceeding the required minimum standards through providing asthma management training for all educators at least annually.

Where the Service retains medications at the service, a *Substance Management Plan* will be developed in accordance with the *Medication and Poisons (Medications) regulation 2021 (Qld)* and in consultation with all educators to ensure children's medication and service provided lifesaving medication is stored and handled correctly and remains within their expiry dates, ensuring safety and compliance.

Skin Rashes

Rashes are common in children and can be caused by many different viral infections and may not be infectious. It is important to be able to describe the rash as this may help with diagnosis. When viewing a rash, educators should also consider if the child is unwell as the rash may not affect the child's well-being at all. There are usually other signs and/or symptoms to consider in conjunction with a rash. Also, when observing the rash, educators should note:

- What the rash looks like (e.g., dark red like a blood blister; small red pinheads; large red blotches; a solid red area all joined together or blisters),
- How does the rash feel to touch (e.g., raised slightly, with small lumps or swollen),
- Is the rash itchy and where on the body did the rash start (e.g., head, neck),
- Where is the rash now (e.g., head, neck, abdomen, arms, legs).

The Nominated Supervisor should be informed of any children presenting with a rash to determine whether there is cause for concern for the child's health (and potentially that of the other children and also educators). If there is doubt as to a child's wellbeing with regards to a rash the parent/guardian will be called immediately.

All rashes should be documented on an Incident, Injury, Trauma and Illness Form. Educators must regularly check the appearance of the rash and note time and any changes on the form. This is important information in case the child needs medical attention.

If concern is expressed about the rash, then the child will be isolated from other children until the parent/guardian can collect the child. If educators are concerned about serious symptoms in conjunction with the rash or perhaps the rash being purple, or spreading very quickly, then an ambulance will be called.

Eczema

If a child suffers from eczema, parents/guardians will be requested to supply a doctor's certificate stating this. A medical conditions management plan will be developed and implemented to enable educators to follow any treatment prescribed by the child's medical practitioner.

As eczema is a chronic condition, children with eczema will not be excluded from attending and families will be supported in managing their child's health condition.

Children's Self-administering Medication (*Regulation 90 (2)&(3)*)

The service allows for children to self-administer medication, subject to the following—

- The parents/guardians must have provided the relevant authorisation via a medication permission form.
- The child must have the capacity to safely administer the medication.

- An agreed plan around the transportation of medication, including ensuring they are always in attendance must be approved by the service.

This information about the symptoms and actions to be taken to support a child will be detailed in the child's medical management and risk-minimisation plan. Plans for the management of medication must also outline how the storage of the medication will be secure, safe and accessible. Children cannot attend the service without access to their required medication.

Despite authority to self-administer, educators should be aware of any relevant signs and symptoms or schedules related to a child's medication administration. Where relevant, educators should prompt or remind children to administer their medication on this basis.

Protocols for Self-Administration

Where a child intends to self-medicate, they must:

- Inform an educator of their intention to take medication
- Collect the medication from where it has safely been stored

Educators will then:

- supervise the child who is self-administering medication/s
- ask the child when medication was last administered (and record this information)
- ensure each child follows all administration of medication, health and hygiene procedures.

Self-Administration Records (Regulation 90 (3))

The service will record all instances of supervised self-administration of medication. [A self-administration record will be kept for the child](#). Details of the date, time and dosage of the medication administration will be recorded by the educator who witnessed the administration.

A copy of the self-administration record can be provided to the parent/guardian at any time.

Educating Children About Allergies and Anaphylaxis

'Allergy awareness' is considered a critical part of managing allergies and ensuring children's safety and wellbeing. Educators will engage in age-appropriate and culturally sensitive discussions with children about foods that are safe and unsafe for children with allergies or anaphylaxis. Educators will use clear, child-friendly terms such as 'this food will make _____ sick', 'this food is not good for _____', and/or '_____ is allergic to that food'.

Educators will support children in understanding the seriousness of allergies and the importance of knowing the signs and symptoms of allergic reactions (e.g., itchy, furry, or scratchy throat, itchy or puffy skin, hot, feeling funny). Educators will talk about proactive strategies to avoid exposure to unsafe foods, such as taking their own plate and utensils, having the first serve from commercially safe foods, thoroughly washing their hands before and after eating and never sharing food or drinks/drink bottles.

Educator Training and Qualifications

The Nominated Supervisor will ensure that educators have appropriate education or training to enable them to undertake basic support of the health needs of children, including administering medications, responding to allergic reactions, basic first aid and adhering to special dietary requirements. This ongoing professional development is essential for maintaining a safe environment.

Additionally, children who are enrolled in the Service with medical conditions and needs requiring specialist knowledge or training will be fully supported. Educators will be provided with access to relevant and specific training for these medical needs ensuring they are confident and competent in caring for all children.

Asthma Management Practices (Regulation 90 (1)(a))

All children diagnosed with asthma must have a medical management plan outlining what to do in an emergency. A risk minimisation plan must be developed in consultation with the parent/guardian of a child diagnosed with asthma to identify the triggers and how these will be managed and monitored within the service (procedures outlined above). The action outlined in a medical management plan should be followed in the first instance.

Responding to Emergency Asthma Incidents

The procedure outlined in the child's medical management plan should be followed in the first instance. Any enrolled child diagnosed with asthma will have a medical management/action/care plan setting out the steps to follow during an asthma flare-up (also referred to as an asthma attack).

However, if this does not alleviate the asthma symptoms, or where a child is not known to have asthma (therefore no plan has been provided), an educator will provide first aid following the steps outlined by Asthma Australia. If the treating educator is not trained in emergency asthma management, an emergency asthma qualified educator should be immediately sought by any persons identifying any relevant symptoms.

Asthma Flare-Up Symptoms

An asthma attack can start slowly (over hours to days) or can get worse very quickly (in seconds to minutes). The most common symptoms of asthma are:

- Wheezing – a high-pitched sound coming from the chest while breathing
- A feeling of not being able to get enough air or being short of breath
- A feeling of tightness in the chest
- Coughing

Treating an Asthma Flare-up (Asthma Attack)

1. Sit the child upright.
2. The educator will be calm and reassuring,
3. Give four (4) puffs of **blue reliever medication** (Ventolin) with slow and deep breathing in after each puff. If using a spacer, follow each of 4 puffs with 4 breaths in and out following each puff,
4. Wait four (4) minutes. If there is no improvement, give four (4) more puffs as above,
5. If there is still no improvement, **call emergency services**; and
6. Keep giving four (4) puffs every four (4) minutes until the emergency services arrive.

Authorisation for administering asthma medication is not required in an emergency.

Once an educator has administered emergency asthma medication, they must notify the parent/guardian and emergency services as soon as practicable (Regulation 94)

Emergency Asthma Equipment

If a child has their own asthma medication, this should be used in the first instance.

For any other reason, the service's first aid kit contains Ventolin (blue puffer) and a spacer. Expiry dates of all puffers used will be closely monitored and replaced when expired. Puffers and spacers from the emergency asthma first aid kit must be thoroughly cleaned after each use to prevent cross contamination.

All asthma medication provided by families and administered by educators and/or self-administered by the child with the condition, must be in accordance with [2.10 Administration of Medication](#) policy of this service.

Anaphylaxis Response (Regulation 90 (1)(a))

Administering an adrenaline autoinjector (Epipen or similar) does not require authorisation in an emergency. In an emergency, educators should administer the medication, then as soon as reasonably practicable, parents/guardians and emergency services must be notified (Regulation 94).

The service will take appropriate action to minimise, as far as reasonably practicable, exposure to known allergens where children have been diagnosed with anaphylaxis. These specific actions will be identified through the risk minimisation planning procedure.

In recognising food allergies are a common (but not the only) source of allergy, in order to minimise the risk of exposure of children to foods that might trigger a severe allergy or anaphylaxis in susceptible children, our service will adopt the following practices:

- Educate children about food allergies and ways to keep people safe,
- Actively discourage children to trade or share food, utensils or food containers,
- Ensure all food handling supports children's medical management plans,
- Request families to label all drink bottles and lunch boxes with their child's name,
- Consider the contents of food and non-food items for inconspicuous triggers,
- Monitor attendances to ensure that meals/snacks prepared at the service do not contain identified allergens when those children are in care; and
- Where a child is known to have a susceptibility to severe allergy or anaphylactic reaction to a particular food, the service will develop policy and implement practice for the management of children, educators or visitors bringing foods or products to the service containing the specific allergen (e.g. nuts, eggs, seafood).

Responding to Emergency Anaphylaxis Incidents

The procedure outlined in the child's medical management plan should be followed in the first instance. Any enrolled child diagnosed at risk of anaphylaxis will have a **medical management/action/care plan** setting out the steps to following during an anaphylactic reaction. A child with a known risk of anaphylaxis will always have their medication administered first.

Symptoms of Anaphylaxis

Can include any one of the following:

- Difficult/noisy breathing.
- Swelling of the tongue.
- Swelling/tightness in the throat.
- Difficulty talking and/or hoarse voice.
- Wheeze or persistent cough.
- Persistent dizziness and/or collapse.
- Pale and floppy (in young children).

In some cases, anaphylaxis is preceded by less dangerous allergic symptoms such as:

- Swelling of face, lips and/or eyes.
- Hives or welts.
- Abdominal pain and vomiting (these are signs of anaphylaxis for insect allergy).

Treating Anaphylaxis Symptoms

1. Lay the person flat – do NOT allow them to stand or walk.
2. Give adrenaline autoinjector (Epipen).
3. Phone emergency services (ambulance).
4. Phone parent/guardian (if practicable).
5. Further adrenaline doses may be given if no response after 5 minutes.
6. Transported to hospital by ambulance (for observation).
7. **If in doubt give adrenaline autoinjector (Epipen).**
8. Commence CPR at any time if person is unresponsive and not breathing normally.

Emergency Medication - Epipen

The service will always have an in-date adrenaline autoinjector (Epipen) in their first aid kit for emergency use. This will be in addition to (and not a substitute for) the prescribed devices for individual children with a diagnosed anaphylactic allergy. **A copy of the ASCIA First Aid Plan for Anaphylaxis will be stored with the emergency Epipen**

This device will be used where:

- A child who is known to be at risk of anaphylaxis does not have their own device immediately accessible or the device is out of date,
- A second dose of adrenaline is required before an ambulance has arrived and emergency services have advised the use,
- The child's prescribed device has misfired or accidentally been discharged; and/or
- A child not diagnosed/identified as at risk of anaphylaxis is symptomatic.

Each child will have the appropriate medication i.e. Epipen (or similar) accessible to educators. Appropriate medication will be stored at the service for each relevant child. These will be stored in a clearly labelled and marked container.

All expiry dates of this medication will be recorded in a replacement schedule, which will be actively monitored by the Nominated Supervisor. Parents/guardians will be advised of expiry 3 months before expiry date. **Children will not be allowed to attend the service without their medication being available.**

In circumstances where a child requires an Epipen (or similar) the service will request an additional device is stored at the service rather than being transported. If these arrangements are not suitable, personalised arrangement and risk-minimisation plans will be identified in collaboration with the Nominated Supervisor, Approved Provider and parents/guardians.

Diabetes Management Practice (Regulation 90 (1)(a))

Children with type 1 diabetes are at most risk from hypoglycaemia (hypo) which occurs when blood sugar levels are too low. Elements that can cause a hypoglycaemia include:

- A delayed or missed meal, or a meal with too little carbohydrate,
- Extra strenuous or unplanned physical activity,
- Too much insulin or medication for diabetes; and/or
- Vomiting.

Hypoglycaemia Symptoms

- headache,
- trembling,
- looking pale,
- feeling hungry,
- sweating,
- lethargy,
- crying,
- being irritable,
- hunger; or
- feeling/acting confused.

Generally, specific action to manage any systems will be set out in the children's medical management plans. However, where the plan does not specify actions the following will occur—

- Support the child to ingest some sugar.
- The child will be directed to rest (must be actively monitored).
- The service will phone parents/guardians.

Symptoms of **severe hypoglycaemia** include being:

- extremely drowsy or disorientated and completely refusing food,
- unconscious,
- having a fit/convulsion, or
- unresponsive.

Any child presenting with these symptoms will require emergency medical attention. The Nominated Supervisor (or Responsible Person or any relevant educator) will respond by calling **emergency services (000)** for an **ambulance** immediately. Relevant first aid practices will be used in the absence of emergency service advice and/or treatment.

Hyperglycaemia (hyper) occurs when blood sugar levels are too high. It can be caused by not enough insulin administered, eating too many carbs, stress, hormones, weather and physical activity.

Hyperglycaemia Symptoms

- Feeling excessively thirsty,
- Frequently passing large volumes of urine,
- Feeling tired,
- Blurred vision,

Actions to manage this should be outlined in management plans. It is likely that the child will require medication. Educators must follow medication administration policies and authorisations in this instance.

Where diabetic management is required, the service will ensure that educators are adequately and appropriately trained in the use of insulin injection devices (syringes, pens, pumps) used by children at the service with diabetes. In the event of major concerns regarding insulin levels of a child, the Nominated Supervisor (or Responsible Person or any relevant educator) will respond by calling **emergency services (000)** for an **ambulance** immediately.

Managing Epilepsy and Identifying Symptoms (Regulation 90 (1)(a))

There are virtually no generalisations that can be made about how epilepsy may affect a child. There is often no way to accurately predict how a child's abilities, learning and skills will be affected by seizures. All children with epilepsy should have a Medical Management Plan. It is important that all those working with children living with epilepsy have a thorough understanding of the effects of seizures, required medication and appropriate first aid.

FOCAL SEIZURES

Focal seizures without impaired consciousness:

Consciousness is NOT impaired, and the effects of the seizure relate to the part of the brain involved. If the site of origin is the motor area of the brain, bodily movements may be abnormal (e.g., limp, stiff, jerking). If sensory areas of the brain are involved the person may report experiences such as tingling or numbness, changes to what they see, hear or smell, or very unusual feelings that may be hard to describe. Young children might have difficulty describing such sensations or may be frightened by these.

Focal Seizures with impaired consciousness:

Often the person's actions are clumsy, and they will not respond normally to questions and commands. Behaviour may be confused, and they may exhibit automatic movements and behaviours e.g., picking at clothing, picking up objects, chewing and swallowing, trying to stand or run, appearing afraid and struggling with restraint. Colour change, wetting and vomiting can occur in complex partial seizures. Following the seizure, the person may remain confused for a prolonged period and may not be able to speak, see, or hear if these parts of the brain were involved. The person has no memory of what occurred during the complex partial phase of the seizure and often needs to sleep.

Focal Seizures becoming bilaterally convulsive:

Focal seizures may progress due to spread of epileptic activity over one or both sides of the brain. Formerly called secondarily generalised seizures, bilaterally convulsive seizures look like generalised tonic-clonic seizures.

GENERALISED SEIZURES

Tonic-clonic seizures: produce sudden loss of consciousness, with the person commonly falling to the ground, followed by stiffening (tonic) and then rhythmic jerking (clonic) of the muscles. Shallow or 'jerky' breathing, bluish tinge of the skin and lips, drooling of saliva and often loss of bladder or bowel control generally occur.

The seizures usually last one to three minutes and normal breathing and consciousness then returns. The person is tired following the seizure and may be confused. If the seizures last more than five minutes an ambulance should immediately be called.

Absence seizures: (previously called petit mal seizures) produce a brief cessation of activity and loss of consciousness, usually lasting less than 10 seconds. Often the momentary blank stare is accompanied by subtle eye blinking and mouthing or chewing movements. Awareness returns quickly and the person continues with the previous activity. Falling and jerking do not occur in typical absences.

Myoclonic seizures: are sudden and brief muscle contractions usually only lasting a second or two, that may occur singly, repeatedly or continuously. They may involve the whole body in a massive jerk or spasm or may only involve individual limbs or muscle groups. If they involve the arms, they may cause the person to spill what they were holding. If they involve the legs or body the person may fall.

Tonic seizures: are characterised by generalised muscle stiffening, lasting 1-10 seconds. Associated features include brief cessation of breathing, colour change and drooling.

Tonic seizures often occur during sleep. When tonic seizures occur suddenly with the child awake, they may fall violently to the ground and injure themselves. Fortunately, tonic seizures are rare and usually only occur in severe forms of epilepsy.

Atonic seizures: produce a sudden loss of muscle tone that, if brief, may only involve the head dropping forward ('head nods'), but may cause sudden collapse and falling ('drop attacks').

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.167 Offence relating to protection of children from harm and hazards
 - s.172 Offence to fail to display prescribed information
 - s.175 Offence relating to requirement to keep enrolment and other documents
 - s.173 Offence to fail to notify certain circumstances to Regulatory Authority
- **Education and Care Services National Regulations:**
 - R.85 Incident, injury, trauma and illness policies and procedures
 - R.86 Notification to parents of incident, injury, trauma and illness
 - R.87 Incident, injury, trauma and illness record
 - R.90 Medical conditions policy
 - R.91 Medical conditions policy to be provided to parents
 - R.92 Medication record
 - R.93 Administration of medication
 - R.94 Exception to authorisation requirement—anaphylaxis or asthma
 - R.95 Procedure for administration of medication
 - R.96 Self-administration of medication
 - R.160 Child enrolment records to be kept by approved provider and family day care educator
 - R.161 Authorisations to be kept in enrolment record
 - R.162 Health information to be kept in enrolment record
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.173 Prescribed information to be displayed
 - R.171 Policies and procedures to be kept available
 - R.174 Time to notify certain circumstances to Regulatory Authority
 - R.174A Prescribed information to accompany notice
- **National Quality Standard:**
 - QA2 – Children's health and safety

Additional Regulatory Context and Guidance

- [Anti-Discrimination Act 1991 \(Qld\)](#)
- [Food Act 2006 \(Qld\)](#)
- [Privacy Act 1988 \(Cth\) / Information Privacy Act 2009 \(Qld\)](#)
- [Medicines and Poisons \(Medicines\) Regulation 2021 \(Qld\)](#)
- NHMRC - [Staying healthy: Preventing infectious diseases in early childhood education and care services](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[2.4 Incident, Injury, Trauma and Illness](#)

[2.7 Infectious Diseases](#)

[2.8 Hygiene, Health and Wellbeing Practices](#)

[2.10 Administration of Medication](#)

[2.13 Emergency Evacuation, Lockdown and Drills](#)

[6.4 Acceptance and Refusal of Authorisations](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.7 Managing Notifications](#)

Forms and Resources

[Medical Risk Minimisation and Communication Plan Medication Administration and Authority Form](#)

Policy 2.9 Medical Conditions in Children		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V2-06.2024 – Included definitions of short term and long term medical conditions, included procedures relating to skin rashes and eczema		
V3-03.2025 – Added information for all roles and responsibilities and added families, additional procedures relevant to communication of plans and policies, substance management plans and educating children about allergies and anaphylaxis. Included information relevant to managing epilepsy and identifying symptoms.		
V4-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced key tasks and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V4-04.2026 – No updates		

2.10 Administration of Medication

Policy Statement

In supporting the health and medical needs of children, the administration of medication is sometimes necessary to provide adequate care. The service is committed to upholding the highest standards of child safety and wellbeing in managing these medical needs. In the interests of protecting children's health and complying with legislation, the Service will only permit medication to be given to a child if it is in its original packaging with a pharmacy label attached.

The Service understands that for some children, self-administration of medication is an important aspect of their care, which will be facilitated by working collaboratively with families. The Service will only authorise self-administration of medication with explicit written authorisation from a parent or guardian.

The Service is committed to ensuring our practices are culturally safe and transparent and aligned with child safe practices. The Service will work in partnership with families, respecting their expertise on their child's needs, to ensure all medication administration procedures are conducted with the utmost care, dignity, and a focus on minimising risk.

A copy of this policy is to be provided to the parent/guardian whenever we are made aware that a child has a specific health care need, allergy or other relevant medical condition. The Service will also adhere to all legislative requirements for the administration of prescribed medicinal cannabis, ensuring all procedures are conducted with the highest level of safety and integrity.

Definitions

Prescribed Medication including Oral Medication – this includes any medication, cream, lotion, powder prescribed by a medical practitioner as well as any over the counter and homeopathic products which are taken orally, and other products applied in the mouth which may be ingested.

Over the Counter Creams, Lotions and Powders – this includes any substance applied to the skin which is NOT prescribed by a medical practitioner. Applies to over-the-counter substances only and includes specific sunscreens, mosquito repellent, antiseptic creams and cosmetic creams.

Emergency and Long-Term Medication – this is medication which is kept at the service for use in an emergency or ongoing manner. It includes Epi-Pens and Asthma Inhalers. These forms must be completed by a Medical Practitioner and be accompanied by a Medical Action Plan completed by a medical practitioner and Medical Risk Minimisation and Communication Plan.

Roles and Responsibilities

Approved Provider	• Educators, staff, students, visitors and volunteers have knowledge of and adhere to this policy and associated procedure, fostering a culture of shared responsibility for child safety. • All new employees are provided with a copy of this policy as part of their induction process. • Establish practices that support the needs of children and uphold safety in the administration of medication. • Ensure the service has suitable facilities for the storage of medication. • Ensure written consent is requested from families on the enrolment form to administer emergency asthma, anaphylaxis, or other emergency medication or treatment if required, proactively preparing for unforeseen emergencies.
Nominated Supervisor	• Collaborate respectfully with families to ensure children's health and medical needs are supported including establishing of practices for the safe transportation of medication. • Ensure educators are aware of their role and duties in supporting the administration of medication for children.

	• Provide all new educators with a copy of this policy as part of their induction process. • Ensure educators, staff and volunteers have a clear understanding of children's individual health care needs, allergy or relevant medical condition as detailed in medical management plans, Asthma or Anaphylaxis Action Plans • Ensure practices are established and maintained to report any issues to the Approved Provider and address any concerns with families maintaining transparent and open communication. • If medication is administered without prior authorisation in the event of an asthma or anaphylaxis emergency the parent/ guardian of the child will be notified as soon as practicable • Reasonable steps are taken to ensure that medication records are maintained accurately • Ensures medication records are kept in a secure and confidential manner and archived for the regulatory prescribed length of time following the child's departure from the Service • Ensures children's health and medical needs are supported through the establishment of practices to ensure safe transportation of medication (where relevant and including excursions).
All Staff	• Support the safe administration of medication for children, including medication is labelled, transported and stored correctly. • Not administer any medication without the written authorisation of a parent/guardian or person with authority, except in the case of an emergency • Witness medication administration including documenting correct dosage, labelling and child's identity.
Families	• Acknowledge consent on the service enrolment form to administer emergency asthma, anaphylaxis, or other emergency medication or treatment if required, demonstrating a shared responsibility for their child's safety. • Complete the Administration of Medication Record for each child who will require medication while in care of the service. A separate form must be completed for each medication if more than one is required • Keep prescribed medications in their original containers with pharmacy labels. Parents/guardians must understand that medication will only be administered as directed by the medical practitioner and only to the child whom the medication has been prescribed. Expired medications will not be administered under any circumstances. • Keep children away at home while any symptoms of an illness remain

Procedures

Permission/Authority (Regulation 92-93)

Upon enrolment, parents/guardians and families are provided with information explaining the expectations for notifying the service of health, medical or other relevant care needs, including any changes to these. Parents/guardians can communicate the need for children to be administered medication at any time during the child's enrolment at the service – either for ongoing requirement or for a fixed time.

A parent/guardian (or persons with relevant authority named in the enrolment form) are required to complete a [Administration of Medication Authority Form](#) when medication needs to be administered by or at the service. Within the Medication Authority, parents/guardians (or other relevant authorised person) will be required to advise:

- Name(s) of medication(s) to be administered:
- Time and date the medication(s) were last administered
- The time and date [or the circumstances under which,] the medication should be next administered.
- Dosage of medication to be administered

- Method (e.g. oral) medication to be administered
- Any additional instructions or information (i.e. medication required to be refrigerated).

Additionally, the record is required to contain:

- The name of the child
- The signature of the parent/guardian (or person named in the enrolment records) authorising the administration of the medication

Administration of Medication (Regulation 93 & 95)

Except for an emergency, staff members will only be permitted to administer medication to a child if it is:

- In its original package/container
 - Where the medication is prescribed - with a pharmacist's label which clearly states the child's name, dosage, frequency of administration, date of dispensing and is within the expiry date period
 - Where over-the-counter medication - bearing the original label and instructions and before the expiry or use by date
- Has been authorised by a parent (or person named in the child's enrolment form),
- In accordance with the details outlined in the Medication Authority and Administering Form completed by the parent (or person named in the enrolment form).
- In accordance with any written or verbal instructions provided by a registered medical practitioner

All medication will be administered by the Nominated Supervisor/Responsible Person or a delegated educator nominated by the Nominated Supervisor or Responsible Person. An additional educator will also be required to witness the administration of medication acting as a critical safeguard.

Administration of medication will be recorded in a [Administration of Medication Authority Form](#). The person administering medication, and the witnessing educator must complete the following details:

- the dosage that was administered
- the method/manner in which the medication was administered
- the time and date the medication was administered
- the name and signature of the person who administered the medication
- the name and signature of that educator who witness the medication administration.

It must be witnessed and checked by another educator who must check

- Right Child
- Right Dose
- Right Medication
- Right Time
- Right Form

Upon collection of the child from the Service, the parent/guardian will be informed of the medication being administered and sign the record to acknowledge this notice.

If, after several attempts a child still refuses to take medication, the parent/guardian will be contacted. Educators will not, under any circumstances, use restrictive practices or force a child take medication.

All medical authorisations, authorities and/or administration records will be stored securely and confidentially with the child's enrolment records (refer policy [7.6 Privacy and Confidentiality of Records](#)).

Emergency Administration of Medication (Regulation 93-95)

In the case of an emergency, authorization to administer medication can be given verbally, when:

- a parent/guardian (or a person named and authorised in the child's enrolment record) consents to administration of medication; or

- if a parent/guardian (or person named in the enrolment record) cannot reasonably be contacted in the circumstances, a registered medical practitioner or an emergency service gives consent.

Where medication is administered in an emergency, the Nominated Supervisor/Responsible Person must notify the parent/guardian of the child as soon as practicable. Written notice (an [Incident, Illness, Injury or Trauma Report](#)) must be supplied to a parent/guardian (or other authorised person) as soon as practicable (but within 24 hours)

Anaphylaxis or Asthma Emergency

- Medication may be administered to a child without authorisation in the case of an anaphylaxis or asthma emergency.
- Where emergency anaphylaxis or asthma medication has been administered to a child, the Nominated Supervisor/Responsible Person must notify the parent/guardian of the child and emergency services as soon as is practicable.

Where medication is administered to a child in an emergency, steps contained in policy [2.4 Incident, Injury, Trauma and Illness](#) may be required, including but not limited to reporting and notifying the incident (also refer policy [7.7 Managing Notifications](#)).

The child will be comforted, reassured, and removed to a quiet area under the direct supervision of a suitably experienced and trained educator prioritising their emotional and physical wellbeing.

Medication Storage and Transport

Whilst at the Service, children with ongoing medications, including asthma medication and EpiPens, must have their medication remain at the Service at all times. Medications for life-threatening medical conditions are not to be transported to and from the Service. In certain circumstances, however, medication may need to be transported to and from school; this will be discussed with the Nominated Supervisor and documented in the child's Medical Risk Minimisation Plan.

Storage

Unless subject to self-administration procedures, all medication will be stored in a labelled and locked medication container with the key kept in a separate location, inaccessible to children. Medications requiring refrigeration will be stored in a labelled and locked medication container with the key kept in a separate location, inaccessible to children.

Educators must always have access to emergency medication – it must not be locked away but must be stored out of the reach of children, refer policy [2.9 Medical Conditions in Children](#), for more details.

Medication for excursions shall be transported in an appropriately secured/locked container readily accessible to administering educators.

Transporting Medication

The Nominated Supervisor (or Responsible Person) will discuss with parents/guardians and agree upon relevant plans for the safe transportation of medication. All medication will be transported in the direct care of a responsible adult. All transportation must uphold the Service's commitment to the safety and protection of children.

Substance Management Plans

Where the Service retains medications at the service, a *Substance Management Plan* will be developed in accordance with the *Medication and Poisons (Medications) Regulation 2021 (Qld)* and in consultation with all educators to ensure children's medication and service provided lifesaving medication is stored and handled correctly and remains within their expiry dates.

Medication Audits

Any medication, cream or lotion kept on the premises will be checked monthly for expiry dates. If a child's individual medication is due to expire or running low, the family will be notified by educators that replacement items are required. MEDICATION WILL NOT BE ADMINISTERED IF IT HAS PAST THE PRODUCT EXPIRY DATE.

It is the family's responsibility to take home short-term medication (such as antibiotics) at the end of each day and return it with the child as necessary. Any medication no longer required to be administered to the child will be returned to the parent/guardian.

A list of First Aid Kit contents close to expiry or running low will be given to the nominated supervisor who will arrange for the purchase of replacement supplies

Families are required to complete an *Administration of Medication Authority Form* for lotions to be administered.

Children's Self-administering Medication (Regulation 90 (2)&(3), 92 & 95- 96)

Refer policy [2.9 Medical Conditions in Children](#)

The Service can permit children over preschool age to self-administer medication, however, the relevant authority form must be completed by the parent/guardian (or authorised nominee), prior to the child administering the medication. The Service will consider all relevant risks when permitting the self-administration of medication, including but not limited to, storage, access and transportation.

This information will be detailed in the child's medical conditions management plan. The medical conditions risk minimisation and communication plan if appropriate, and the location of the child's medication for self-administration must be noted and made available to educators.

Educators will supervise children who are self-administering medications to promote consistency and ensure the welfare of all children using the service. Educators will ensure each child follows all administration of medication, health and hygiene procedures and record all instances of supervised self-administration of medication as per the procedures articulated within this policy.

For children with asthma, diabetes or other similar ongoing medical conditions requiring medication, parents/guardians will be required to advise the Nominated Supervisor in writing whether their child will be responsible for administering their own medication as well as full details of how, when (i.e. at what intervals) and by whom all such treatment is to be administered.

Administering Medicinal Cannabis

Medicinal cannabis as prescribed by a medical specialist, or general practitioner in consultation with a medical specialist, may be administered by staff members to a child attending the Service following written authorisation from the Approved Provider.

For a child attending the service who has been prescribed medicinal cannabis a Medicinal Cannabis Management Plan signed by a specialist or general practitioner must be provided. The plan must include:

- Details of safe storage.
- Details of administration.
- Risk assessment for holding and administering medicinal cannabis and how these risks will be managed.

Additionally, the Administering of Medication Authority Form will be completed by the parent/guardian/ authorised nominee. The medicinal cannabis as prescribed for administration to a child must be stored in a locked storage receptacle so as not to be in breach of National Regulation 82.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- Education and Care Services National Law:
 - s.167 Offence relating to protection of children from harm and hazards
 - s.173 Offence to fail to notify certain circumstances to Regulatory Authority
 - s.175 Offence relating to requirement to keep enrolment and other documents

- **Education and Care Services National Regulations:**
 - R.90 Medical conditions policy
 - R.91 Medical conditions policy to be provided to parents
 - R.92 Medication record
 - R.93 Administration of medication
 - R.94 Exception to authorisation requirement—anaphylaxis or asthma
 - R.95 Procedure for administration of medication
 - R.96 Self-administration of medication
 - R.160 Child enrolment records to be kept by approved provider and family day care educator
 - R.161 Authorisations to be kept in enrolment record
 - R.162 Health information to be kept in enrolment record
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA2 – Children’s health and safety
 - QA4 – Staffing arrangements
 - QA6 – Collaborative partnerships with families and communities.
 - QA7 – Governance and Leadership

Additional Regulatory Context and Guidance

- [Health \(Drugs and Poisons\) Regulation 1996](#)
- [Medication and Poisons \(Medications\) regulation 2021 \(Qld\)](#)
- [Public Health \(Medicinal Cannabis\) Act 2016](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related policies and procedures

- [2.4 Incident, Injury, Trauma and Illness](#)
- [2.7 Infectious Diseases](#)
- [2.8 Hygiene, Health and Wellbeing Practices](#)
- [2.9 Medical Conditions in Children](#)
- [2.13 Emergency Evacuation, Lockdown and Drills](#)
- [6.4 Acceptance and Refusals of Authorisation](#)
- [7.4 Leading Compliance and Quality Assurance](#)
- [7.6 Privacy and Confidentiality of Records](#)
- [7.7 Managing Notifications](#)

Forms and Resources

- [Medical Risk Minimisation and Communication Plan](#)
- [Medication Administration and Authority Form](#)
- [Substance Management Plan](#)

Policy 2.10 Administration of Medication		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V2-06.2024 – Included procedures relating to medicinal cannabis		
V3-03.2025 – Added information for all roles and responsibilities and added families, additional procedures relevant to substance management plans and medication audits.		
V4-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V4-04.2026 – No updates		

2.11 Sun Safety

Policy Statement

Our service is committed to ensuring the safety, wellbeing, and cultural safety of all children in our care. This includes protecting them from the harmful effects of the sun's ultraviolet (UV) radiation.

The Service recognises the opportunity to promote and establish excellent health and safety practices for children and views its sun safety practices as a chance to form good life-long habits and educate children about sun smart behaviour. Likewise, the Service expects that all children, staff and visitors attending our service are protected from skin damage caused by harmful UV radiation from the sun and will follow these procedures.

This policy aligns with the Queensland Cancer Council's Sun Smart Policy Guidelines for Education and Care Settings and ensures the approach is integrated with alignment between procedures, the program and the environment.

Our sun safety practices are a fundamental part of our commitment to child safety and wellbeing. This policy outlines how we will:

- Protect children, educators and staff from harmful UV radiation, heat-related injuries, and burns from hot surfaces and equipment.
- Empower children to develop independence and agency in their own sun safety practices, respecting their individual needs and choices.
- Create a culturally safe environment where all children feel comfortable and included. We will be mindful of diverse cultural backgrounds and individual needs when implementing this policy.
- Collaborate with families and the community to ensure a consistent and supportive approach to sun safety.

Due to our location and the sustained levels of UV radiation throughout the year, our sun-safe practices are adopted all year round, regardless of season. The dominant guide for the level of sun protection is the relative UV rating. The Service will ensure proportionate sun protection is utilised where the UV rating is above Level 3 or more.

Where activities are held outdoors, the service will maximise the opportunity to access shade. Where shade is unavailable (i.e., excursions), higher levels of sun protection will be adopted.

Families are required to meet their responsibilities, including ensuring their child is equipped with the appropriate sun safe items for the activities (hats, sleeved shirts etc.). These expectations may vary based on session of care (i.e., vacation care) and the nature of activity (i.e. swimming). Parents/guardians will be kept fully informed of specific requirements. At a minimum, hats must be brought to every session of care.

Roles and Responsibilities

Approved Provider	• Ensure policies and procedures are developed and implemented to address matters related to the sun protection measures and practices (as per Regulation 168). • Prioritise natural shade (trees and plants) and ensure sufficient man-made shade is provided in high-use areas. • Conduct regular risk assessments to identify and mitigate hazards such as hot play equipment and surfaces.
Nominated Supervisor	• Provide information and resources to ensure SunSmart procedures are followed, understood and implemented by Educators, in accordance with this policy and procedure. • Ensure practices are role-modelled and followed by all children, educators and visitors. • Maintain an adequate supply of sunscreen which has not expired and ensure authorisations to apply have been provided

	- For families supplying their own sunscreen, the Service must regularly check the available supply and expiry dates and keep the authorisation to apply in the child's file. - Ensure suitable resources and equipment is available and accessible (spare hats, sunscreen etc.). - Ensure plans and routines support children sun safe behaviours and education. - Ensure the routine and program identify opportunities to reduce exposure to high-levels of UV radiation.
All Staff	- Encourage and educate children on safe sun practices. - Role-model desired behaviours including wearing a hat when outside and applying sunscreen. - Address instances where services policies are not being followed through supportive interactions.
Families	- Ensure documentation/authorisations are completed in relation to sunscreen application and sensitivities - Provide sunscreen (if required) to remain at the Service that is labelled with the child's name and not expired. - Provide a wide-brimmed or bucket hat for their child while attending the Service.

Key Tasks and Responsibilities

Monitoring UV Rating	The Nominated Supervisor or Responsible Person will be responsible for understanding the relevant times of high-risk UV ratings to enforce sun safety measures.
Supervising Sun Safety	All educators are responsible for modelling sun-safe practices and be wearing a hat while outdoors. The Nominated Supervisor or Responsible Person will ensure educators are enforcing expectations for sun safety and that children are using the relevant sun safe measures.

Procedures

Understanding Daily UV Rating

The Service will monitor daily UV rating times online with the Nominated Supervisor being aware and communicating the specific times the level of sun protection is required. For periods of the day at or above UV Level 3, sun-safe practices must be strictly followed.

Requirements for Sun Safety

Practices for UV Rating 1 and 2

Some form of sun protection (typically shade or hats), to promote embedded sun-safe behaviours, will be expected when UV ratings are at non-damaging levels. This expectation is balanced with the benefits of physical activity.

Practices for UV Rating 3 and above

The Service will adopt proportionate sun-safe measures where UV ratings are at potentially damaging levels. Generally, this will mean multiple sun-safe measures appropriate to the circumstance.

The Service and school expectation of wearing a hat means that it is a requirement for outdoor play during sun protections times (UV Rating of Level 3 or more).

Where UV ratings are Level 6 (high) and above, **all accessible sun-safe measures** will be expected to be used.

Sun Safe Measure	Directions
Sun Protection times	Wherever practicable, outdoor activities should take place before 10am and after 3pm, when UV levels are lower
Hats	No hat – no outdoor play rule (where there is a risk of sun damage) will be enforced. Children without a hat can play in shade where UV Rating are Level 1 or 2. - Children must bring their own hats to the service. However, in emergency cases only, spare hats are available. Borrowed hats must be placed in OSHC laundry basket at the end of the session. - Wide-brimmed or bucket hats are the preferred hat. Caps will be accepted during vacation when sunscreen is also applied.
Shade	- Where possible, educators will operate outdoor activities, including excursions, in shaded areas. - The availability of shade is considered when planning all outdoor activities. - Children are encouraged to choose and use available areas of shade when outside. - Play activities will be set up in the shade and moved throughout the day to take advantage of shade patterns. - Children who do not have appropriate hats or outdoor clothing are asked to choose a shady play space or a suitable area protected from the sun.
Sunscreen	- Children and staff will be provided with minimum SPF30 sunscreen. Parents/guardians can supply a suitably alternative (e.g. where a child is sensitive to sunscreen). - All sunscreen will be applied as per manufacturer's directions, including time before entering sun and re-applying. - Sunscreen must be worn for outdoor activities between 10am and 3pm or where UV Levels are 6 or above. - Educators will apply sunscreen to younger children where required, using gloves or tissues. If using bare hands, hands must be washed between application of sunscreen to each child - Generally, children will be expected to apply their own sunscreen with the supervision of educators. Assistance from educators may be offered, where required.
Clothing	- Children and staff must wear a top with sleeves to the service – ideally, covering as much skin as possible. - Singlets or sleeveless tops are not permitted. Spare shirts with sleeves are available in spare clothing drawer in case of emergency.
Swimwear	For swimming and water play activities, a sleeved swim top (i.e. a rashie) must be worn over swimwear that does not cover an equivalent area. A Lycra top is preferred option.
Sunglasses	The use of sunglasses is accepted (where children/ parents/guardians wish these to be worn). However, the Service recognises sunglasses often aren't practical for children.

Supporting Sun Safety and Policy Compliance

The Service, where possible, will attempt to have spare items available. When parents/guardians do not provide appropriate clothing and equipment for children, the first step is for the Nominated Supervision/Responsible Person to have a gentle 'prompting' conversation with the parent/guardian. Where this does not impact a change, the Nominated Supervisor will correspond formally with the parent/guardian to address the concerns. Ongoing enrolment is dependent on parents/guardians complying with the Service's expectations for health and safety.

Role-Modelling

Educators will ensure that all personnel including themselves, children and visitors attending the Service are protected from the harmful UV effects of the sun during periods of increase UV rating. This includes Sherwood State School OSHC Policies and Procedures – V5-04.2026

adopting the same practices expected of children. Educators will be supplied with hats as part of the uniform and are expected to wear them while outdoors.

Playground Risks

Many playground surfaces and equipment can exceed temperatures greater than 50°C and if young children come into contact with these surfaces, they can be burned severely within seconds.

The Nominated Supervisor will ensure risk assessments are conducted to identify any potential hazards to children during months (e.g. summer) that could cause harm or injury to children. Risk minimisation control measures will be put in place to protect children. Potential hazards could include:

- hot equipment- slides, poles, guardrails, any metal surfaces
- hot surfaces- rubber and synthetic grass, walkways, concrete surfaces
- sun burn
- access to bodies of water (filled water troughs/containers/trays/pools)
- complete a *Daily Playground Surface Temperature Check* during summer months or extreme hot weather

Use a thermometer or their hand to test surface temperature and make an informed decision about permitting children to play on equipment or in the outdoor space. If the surface temperature is determined to be too hot or is recorded as at or above 50°C it is recommended by Kidsafe Australia that children do NOT play on the surface.

Encourage children to wear their wear shoes when playing in the outdoor area, if the area is not very shaded and it has been a hot day.

Excursions and Swimming Activities

Potential exposure of UV radiation will form part of the service's risk assessment. Where possible, plans for access to shade will be created. However, the Service recognises that there are often limitations during these types of activities. Where shade is not readily available, the service will mitigate risks by selecting more appropriate times of the date (where possible) or using strictly using all available sun protection measures (hats, sunscreen, appropriate clothing/swimwear).

Promoting Learning and Skill Development

Opportunities to incorporate sun protection into the program will be continually explored. Displays will reinforce the expectations and positive sun-safe messaging.

Children are encouraged to be involved in initiatives to promote and model sun protection measures at the service including taking leadership roles in managing sun protection e.g. accessing daily UV levels and sun protection times, hat reminders and management of sunscreen

Physical Environment – Quality Improvement

The Service will continue to explore opportunities to enhance the environment for additional shade. Where aspects of the environment are in the control of the service (i.e. use), the most sun-safe option to carry out activities will be selected.

The Service will continually explore ways to collaborate with the school to seek further development of shaded play spaces to enhance the environment.

Engaging Families and the Community

Enrolment information will provide information around the Service's Sun Safety Policy. Parents/guardians wishing further information can contact one of the Service's leaders.

Ongoing feedback and support will be sought from parents/guardians and the school community for the sun safety policy and its implementation through newsletters and, parent/guardian meetings etc.

Where possible, alignment with school expectations will be sought, to ensure a consistent message and expectation for children.

The sun safety policy will be reviewed periodically with children, staff, parents/guardians and the Approved Provider.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.114 Outdoor space—shade
 - R.155 Interactions with children
 - R.161 Authorisations to be kept in enrolment record
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA6 – Collaborative partnerships with families and communities

Additional Regulatory Context and Guidance

- [Cancer Council Queensland's SunSmart Policy Guidelines – Early Childhood Cancer Council Australia](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[1.1 Educational Program Development and Implementation](#)

[1.4 Excursions, Incursions and Regular Outings](#)

[2.1 Providing a Child Safe Environment](#)

[2.4 Incident, Injury, Trauma and Illness](#)

[2.5 Administration of First Aid](#)

[2.6 Water Safety](#)

[2.9 Medical Conditions in Children](#)

[6.4 Acceptance and Refusals of Authorisation](#)

Policy 2.11 Sun Safety		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V2-03.2025 – Added information for AP and NS roles and responsibilities and added families, additional procedures relevant to playground risks and medication audits, additional points in sun safe measures table.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

2.12 Safe Food Handling, Preparation and Storage (Food Safety Program)

Policy Statement

The service is committed to ensuring the safety, wellbeing, and cultural safety of all children. This includes a strict adherence to safe food handling and storage practices. The Service recognises our obligation to ensure all food provided is safe for consumption, taking into account the diverse needs of all children in our care. All food served is handled, prepared, and stored in a manner consistent with quality food safety standards, including the Australian and New Zealand Food Standards Code and the Staying Healthy in Childcare guidelines. Our commitment to these standards is a core component of our responsibility to ensure child safe practices are embedded.

Safe Food Handling Practices

The Service has strict procedures to ensure food prepared, stored and served by the Service upholds food safety standards. The Service's food safety program is designed to protect children from food-borne illnesses and allergic reactions. A key focus is on the safe preparation and storage of potentially hazardous food items, which are—

- Foods that must be kept at a particular temperature to minimise the growth of food poisoning bacteria that may be in the food, or to stop the formation of toxins.
- These types of foods are typically protein-rich foods (such as meat, dairy products), processed fruit and vegetables. and previously cooked food.

Roles and Responsibilities

Approved Provider	• Establish and oversee sound food handling, preparation and storage procedures. • Ensure facilities and equipment support the safe preparation, handling and education of food. • Ensure educators and staff are aware of their responsibilities and obligations under the National Regulations in relation to this policy and relevant procedures to ensure awareness of safe food handling practices. • Ensure enrolment forms include information relating to child's food preferences, allergies, intolerances, cultural or religious considerations or medical conditions which involve food or food practices • Appoint a qualified Food Safety Supervisor to oversee all food handlers • Ensure the Food Safety Supervisor and all staff attend basic safe food handling training, including an appropriate Food Safety and Food Hygiene Certificate
Nominated Supervisor	• Actively monitor and support safe food handling practices to protect children's health. • Coordinate with the Approved Provider to ensure the practices and equipment meets the needs of the service and children. • Ensure educators are provided with suitable training and instruction to handle food as described in the outlined procedures. • Where applicable, keep an up-to-date Food Safety Certificate Register to provide evidence of safe food handling training for all food handlers. • Where applicable, keep records relating to receiving, storage, processing, displaying and transportation of food. These records must be kept for a period of 3 months • Consult with families on enrolment to develop individual management plans, including completing Risk Minimisation Plans for children with medical conditions involving food allergies, food intolerances and special dietary requirements

All Staff	• Participate in safe food handling training on a regular basis, every 12 months, including the completion of an appropriate Food Safety and Food Hygiene Certificate • Ensure safe food handling procedures are followed at all times. • Keep records relating to the safe handling of food, where required • Support children in handling and preparing food to guide learning, development and safe practices, always ensuring their safety and wellbeing.

Procedures

If the Approved Provider is a State School Parents & Citizen's Association, then the OSHC Service constitutes as a Government-run entity and is therefore exempt from requiring a food-handling business license, as per the Food Act 2006. As such, the Service may serve more than 12 'meals' per year.

While exempt from needing a food handling business license, the Service is still required to comply with the intentions of the Food Act 2006 by:

- Ensuring food sold is safe and suitable for consumption by complying with the National Food Safety Standards (as per procedures set out in this policy),
- Maintaining compliance with the National Quality Standards (not a requirement of the Food Act 2006),
- Complying with the Education and Care Services National Law 2010 and Regulations 2011.

Food Safety Program

Purchasing Food and Receiving Food Items

The Service will purchase food products from reputable food businesses. Ideally, suppliers will be limited to those who services and products have been found to be reliable. Where alternative arrangements are needed, products will be sourced from appropriately licenced food businesses.

Largely, products are delivered to the service from the supplier. When products are purchased and are delivered, the following conditions must be met:

1. Food should be covered or packaged (without damage) on arrival.
2. The staff member collecting the food or products should inspect to ensure no food or product is spoiled, has damaged packaging or past used-by date.
3. The staff member should check the temperature of the food including –
 - a. Chilled food is at or below 5°C,
 - b. Frozen foods are hard (not partly thawed), or
4. Food not meeting these requirements should be rejected.
5. The food or product should be immediately placed in the appropriate storage location –
 - a. Freezer for frozen foods,
 - b. Fridge for chilled foods, or
 - c. Pantry for shelf-stable foods.

Food Storage

Food must be stored in an appropriate environment to protect it from contamination and to maintain the safety and stability of the food including:

Dry Storage (pantry/cupboard)	• Educators to inspect for signs of pests and the premises is regularly treated by a licensed pest controller. • Opened packaged products are stored in clean, sealed food grade containers (or re-sealable packaging). • Products are rotated and weekly inspections identify out-of-date stock. • Food is stored in accordance with manufacturer's specifications • Ensure that chemicals are stored away from food stock. • Do not overcrowd the storage area. Food must be stored off the floor.

Cold Storage (fridge)	• Temperature checked and recorded daily with a thermometer to ensure below 5°C. • All potentially hazardous foods stored in a clean and covered food grade container or wrapped in a protective covering. • Fridge should not be overcrowded. • Raw foods must be separated from cooked or ready-to-eat foods. With ready-to-eat foods stored above raw foods. • Date mark and label stored food.
Frozen Storage (freezer)	• Frozen food needs to be stored frozen hard (not partially thawed). • Frozen food must be stored and covered in clean containers. It should be clearly labelled and dated to allow for stock rotation. • Frozen storage areas must not be overcrowded.

All food items kept in the pantry, freezer or refrigerator will have the 'use by' and 'best before' date checked prior to the food item being used in preparation. Food is discarded when stored outside of these requirements (contaminated, incorrect temperature, out-of-date etc).

There will be a suitable area or receptacle for the disposal of food waste. This is to be covered and emptied daily into outside garbage units that are collected regularly.

Food Recall

The service will monitor foods purchased to ensure recall alerts have not been enacted. Recall alerts may be distributed via television, newspaper and radio communications from the manufacturer or recognised health authority.

Any foods recalled under food alerts will be repackaged and returned or destroyed according to instructions as per the food recall alerts..

Thawing

Thawing potentially hazardous food may pose a food safety risk if the temperature of the food is between 5°C and 60°C during thawing, allowing food poisoning bacteria to grow. All thawing of frozen food will be planned and either occur via the fridge or microwave.

Controls for thawing

- Thaw raw frozen food on a shelf in the fridge below ready-to-eat food.
- Keep all food protected, covered, wrapped or in a food grade container while thawing,
- Do not re-freeze thawed food,
- small portions of raw frozen meat and fish may be able to be safely cooked without complete thawing, however, large portions of food should be completely thawed before cooking.

Discard thawed potentially hazardous food that has been:

- left to stand at above 5°C for more than four (4) hours.
- contaminated during thawing.
- frozen more than once.

Preparation and Handling

When preparing and handling food, there is risk of contamination and bacteria causing food-borne illness. There are three main hazards which are controlled during food preparation –

- Biological – bacteria growing to unsafe levels.
- Physical – things like dirt, hair, glass or other food product entering meals.
- Chemical – things like cleaning products etc. contaminating food.

The service's safe food handling practices address these risks—

1. Food handlers will have appropriate skills and knowledge for each food preparation task.
2. Clean and inspect food preparation surfaces, equipment and utensils before use.
3. Wash hands properly before starting food handling.
4. Ready-to-eat food is kept apart from raw ingredients during preparation, including:

- a. Fruit and vegetables intended for immediate consumption must be washed before preparing, including those where the skin is not intended to be eaten.
 - b. Use separate utensils and cutting boards when preparing raw food and ready-to-eat food. Washing, sanitising and thoroughly drying cutting boards and utensils between use.
5. Minimise the time that potentially hazardous food is above 5°C and return food to the refrigerator during any break in preparation.
6. Wiping cloths should be replaced daily and cleaned, rinsed and dried between uses.
7. Throw away single use items after one use.
8. Any food contaminated by dirty equipment or other cross-contamination is thrown away.

Personal Hygiene for Food Handlers

Clean clothing will be worn by food handlers (such as an apron or appropriate jacket) with long hair tied back or covered with a net (hairspray may be used for fringes to secure hair).

Hand and wrist jewellery should not be worn while preparing food (e.g. rings and bracelets) and fingernails should be kept short and clean and no nail polish is worn (as it can chip into food and hide dirt under the nails)

Strict hand-washing hygiene is adhered to, including washing hands each time they return to the kitchen before continuing with food preparation duties. Wounds or cuts are covered with a brightly coloured, waterproof dressing (that will easily be seen if it falls off), and gloves will be worn over any dressings. Staff who are not well will not prepare or handle food.

Safe Food Handling Practices

All children and staff will wash and dry their hands (using soap, running water, and single use disposable towels or individual hand towels) before handling food or eating meals and snacks.

All staff handling 'ready to eat' foods will wear gloves or use food tongs to serve food.

Food will be stored and served at safe temperatures (below 50°C or above 60°C), with consideration to the safe eating temperature requirements of children.

Separate cutting boards will be used for raw meat and chicken, fruit and vegetables, and utensils and hands are washed before touching other foods. Children will be discouraged from handling other children's food and utensils

Cooking

Hot food must be fully cooked to a sufficient temperature to achieve a safe temperature for consumption. Potentially hazardous foods, which are not fully cooked, will not be safe to eat, as bacteria will not be killed.

For hot foods, the food handler must use a thermometer to check the internal temperature has reached a **minimum of 74°C**. If the temperature in the centre of the potentially hazardous food does not reach at least 74°C, continue cooking until the internal temperature is achieved.

The 2 hour/4 hour guide

Maintain potentially hazardous food at a temperature of 5°C or below or 60°C and above. If food is kept between 5°C and 60°C, this temperature must be monitored and recorded.

- Potentially hazardous food that has been kept between 5°C and 60°C for **less than two hours** must be **refrigerated or used immediately**.
- Potentially hazardous food that has been kept between 5°C and 60°C for **longer than two hours but less than four hours** must be **used immediately**.
- Potentially hazardous food that has been kept between 5°C and 60°C for **longer than four hours** must be **thrown out**

Cooling Food

Hazardous food that is intended to be cooled and use later, needs to reach a temperature of 5°C or colder as quickly as possible. There may be food poisoning bacteria in the food even though it has been cooked. Faster cooling times limit the time when these bacteria are able to grow or form toxins.

When cooling cooked potentially hazardous food, cool the food within the following timeframes:

- from 60°C to 21°C within two hours; and
- from 21°C to 5°C within a further four hours.

This means you have a maximum of six hours to cool food from 60°C to 5°C or below.

To chill food quickly, break it up into smaller portions in shallow containers. Care must be taken to not to contaminate the food as this is done.

if the above cooling times and temperatures have not been reached, the food must be thrown away. Discard any potentially hazardous food that may have been contaminated during cooling.

Reheating and Hot Holding

If you reheat previously cooked and cooled potentially hazardous food, you must reheat it rapidly to 60°C or hotter. Meaning that food must be reheated **to 60°C within a maximum of two hours**. The temperature of reheated potentially hazardous food must remain at 60°C or above.

Potentially hazardous food that has been cooked and cooled must only be reheated once. Therefore to minimise risk of bacteria build up, no food bought in from home is to be reheated whilst at the Service.

Hot holding equipment (such as a bain marie) should never be used to cook or reheat food. Do not overload hot holding equipment and ensure the temperature setting keeps the food at or above 60°C

When re-stocking potentially hazardous food in hot holding equipment, never add new batches of food to old batches of food, remove the old batch and replace with new batch.

Allergens

Certain foods can cause some people to have an allergic reaction which can vary in severity from mild upsets to severe anaphylactic reactions. It is important food handlers are able to identify which products contain allergens.

Food handlers should be aware of sensitivities, especially children whose severity is significant and ensure their meals are prepared separately.

Cleaning Program

Anything that comes in contact with food must be cleaned and sanitised after use, with a commercial sanitiser (following the manufacturer's instructions) including (but not limited to):

- Plates and bowls
- Utensils for preparing and serving food
- Cutting boards
- Preparation benches
- Storage containers

Steps for cleaning utensils and equipment

1. **Pre-clean:** scrape, wipe or sweep away food scraps and rinse with water,
2. **Wash:** use hot water and detergent to take off any grease and dirt. Soak if needed,
3. **Rinse:** rinse off any loose dirt or detergent foam,
4. **Sanitise:** use a sanitiser to kill any remaining germs (read sanitiser's instructions to see if a second wash is required); and

5. **Dry:** allow to drip-dry if not possible, dry with paper towel or a clean tea-towel (and wash after each use).

Items and areas which do not come in contact with food only need to be washed with detergent, using the following schedule —

Floors, rubbish bins, used equipment	Daily
Fridge, microwave, hot holding equipment, cupboards and shelves	Weekly
Freezer	Monthly
Windows, walls, ceilings, ovens	Quarterly

Immediate cleaning is necessary for spills and potential hazards. The Service will ensure regular pest and vermin maintenance is conducted to prevent contamination.

Safe Food Handling Training

The Nominated Supervisor will ensure that educators are provided with adequate training and instruction in relation to food handling and storage procedures, including induction processes to inform educators on the service's practices for food safety.

Food safety and food hygiene training will be provided through such means as external workshops, in-service workshops, induction, in-house training, and workplace documents displayed to feature food safety responsibilities and requirements in accordance with the service's food safety plan.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.77 Health, hygiene and safe food practices
 - R.78 Food and beverages
 - R.79 Service providing food and beverages
 - R.80 Weekly menu
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety
 - QA3 – Physical environment
 - QA4 – Staffing arrangements

Additional Regulatory Context and Guidance

- [Food Act 2006 \(Qld\)](#)
- [Australia and New Zealand Food Safety Standards](#)
- [Australian dietary guidelines - National Health and Medical Research Council's](#)
- [Queensland Education's Smart Choices strategy](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[1.1 Educational Program Development and Implementation](#)

[1.6 Food and Nutrition](#)

[2.1 Providing a Child Safe Environment](#)

[2.9 Medical Conditions in Children](#)

[3.1 Space and Facilities Requirements](#)

[4.9 Fitness for Work](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.12 Workplace Health and Safety](#)

Policy 2.12 Safe Food Handling, Preparation and Storage (Food Safety Program)		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V2-03.2025 – Added information for all roles and responsibilities, additional procedures relevant to P&C Operated services, food recall, personal hygiene for food handlers and safe food handling practices.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

2.13 Emergency Evacuation, Lockdown and Drills

Policy Statement

This policy is designed to ensure the safety, wellbeing and cultural safety of all individuals within our facility, with a particular focus on children. In the event of an emergency, Educators will follow clear and systematic procedures to provide an immediate and effective response. The purpose of this policy is to uphold our commitment to children's safety and wellbeing by managing risks of harm effectively, safeguarding everyone in and around the Service and empowering children and staff to respond confidently and calmly.

The Service's emergency plans have been developed from sound risk assessment of potential emergencies relevant to the Service. The procedures derived from the risk assessment set out actions and responsibilities for—

- Emergency evacuation.
- Lockdown.
- Responding to a bomb threat.

The policy also captures the management and integration of these emergency plans, including training and drills for both evacuation and lockdown, ensuring that children and educators are familiar with the procedures and know their roles and responsibilities. This preparation is crucial for ensuring a swift, coordinated response during a real emergency.

The Service recognises that a timely and controlled response to emergency events, such as a fire, bomb threat or lockdown contributes significantly to upholding the safety and wellbeing of children, staff and any other individuals onsite. The Service is committed to ensuring safety of all relevant persons through sound preparation, rehearsal, evaluations and the actual undertaking of an emergency response.

The scope of this policy and procedure applies to both the:

- Response to emergency events while on the school premises
- Ongoing review, preparation and development of risk-assessed responses to emergency events

Roles and Responsibilities

Approved Provider	• Ensure a comprehensive risk assessment has been undertaken to identify potential emergencies that are relevant to the service including environmental and human-related threats. • Ensuring policies and procedures are in place so all staff are instructed and trained in the emergency evacuation and lockdown plans. • Ensure emergency evacuation action plans have been developed through risk-assessment practices that identify potential emergencies. • Ensure that a copy of the emergency and evacuation floor plans and instructions are displayed in a prominent position near each exit that forms part of an evacuation route. • Ensure emergency and evacuations plans are rehearsed and documented every three months. • Ensure processes are developed to monitor the function and working order of fire equipment. • Ensure clear procedures are in place for when a flood warning occurs to ensure the safety of educators, children and families. • Ensure there is a procedure for out of hours decision making. • The service insurance policy is current and covers the service for flood damage
Nominated Supervisor	• Support the Approved Provider in facilitating the collaborative ongoing review and development of emergency and evacuation plans with a focus on child safety, wellbeing, and cultural considerations. • Ensure that all educators, staff and volunteers are trained in the emergency and evacuation procedures • Ensure that all educators and staff are aware of emergency evacuation points

	• Ensure the relevant drills are undertaken in accordance with the Service's procedures. • Ensure a range of possible emergency scenarios are included in evacuation drills • Keep a documented record of each rehearsal and reflections that occurred after • Collaborate with educators and staff to develop procedures to manage all risks associated with emergency and evacuation situations • Communicate emergency drill evaluations and any identified concerns to the Approved Provider. • Ensure that emergency equipment is tested within the timeframes recommended by recognised authorities • Ensure an Emergency Evacuation Kit is prepared, fully stocked at all times and in an easily accessible area. • Ensure the Service environment is maintained to support the safe response to emergency events (doorway are kept clear, workplace health and safety items addressed) and that plans and resources are maintained and displayed as outlined in the procedure. • Liaise with Emergency Services instructions and react to changing conditions during significant weather event emergencies.
Responsible Person in Charge	• Initiate and lead the emergency evacuation or lockdown response including undertake drills as required while maintaining a calm and reassuring presence for children. • Ensure the Emergency Evacuation Kit is prepared and fully stocked at all times. • Provide feedback and guidance to staff and children of their response to emergency and evacuation drills. • Liaise with Emergency Services instructions and react to changing conditions during flood emergencies
All Staff	• Respond to hazards or potential signals or an emergency event • Immediately alert other staff of the emergency situation. • Become familiar with the emergency evacuation plan identifying routes and safe locations if evacuation is required (note: this may be different for a flood situation) • Support children and other individuals onsite to follow the emergency and evacuation plans in a way that minimises distress and ensures their safety. • Understand your role and responsibilities in an emergency or evacuation response. • Participate in planning and review of emergency plans and drills.
Families	• Ensure the service has up-to-date contact details for parents/guardians and emergency contacts • Ensure you complete the attendance record on delivery and collection of your child • Provide emergency contact details on your child's enrolment form and ensure this is kept up to date • Be aware of the service's emergency and evacuation policy and procedures • Reinforce the service's emergency and evacuation procedures with your child • If present at the service at the time, follow the directions of educators and staff in the event of an emergency or when rehearsing emergency and evacuation procedures

Key Tasks and Responsibilities

Emergency Plans	The Approved Provider is responsible for ensuring plans have been created from a risk assessment. The Nominated Supervisor will collaborate with the Approved Provider to refine and develop plans as needed.
Inspections for a Safe Environment	Educators will support the Nominated Supervisor by carrying out daily inspections that ensure the safe egress or ingress to assembly areas, should they be required.

Carrying our Evacuation or Lockdowns	The Nominated Supervisor or Responsible Person will lead the emergency evacuation or lockdown response including leading drills. Educators follow their responsibility to gather and transition children to safety and carry out any other support tasks required. Educators will also play a key role in alerting others to the emergency.
Documentation	The Nominated Supervisor or Responsible Person will complete the relevant record for the rehearsal (drill) or in the event of an actual event, the relevant notification report.

Procedures

Emergencies Risk Assessment

The Approved Provider and Nominated Supervisor will ensure all educators and staff understand and are competent at undertaking an emergency risk assessment and implementing and managing these situations. This procedure aims to assist and support educators and staff to complete the risk assessment and management plan for an emergency situation.

The Nominated Supervisor will ensure a trauma-informed and culturally safe approach is integrated into all risk assessments. This means considering how emergencies might impact children's emotional wellbeing and how to support them during and after the event.

The Emergencies Risk Assessment will explicitly address how to support children with diverse needs, including those with disabilities, chronic health conditions, and children from Aboriginal and Torres Strait Islander and culturally and linguistically diverse backgrounds. This includes considering mobility aids, communication strategies, and cultural protocols.

To adequately inform evacuation procedures, each hazard will be identified and assessed for its potential impact on children's safety and wellbeing and will include procedures on how to ensure the cultural safety of children during an emergency. This may include, for example, identifying a safe space that is culturally appropriate.

The Nominated Supervisor in consultation with all educators and staff to ensure:

- Evacuation procedures are designed to ensure a calm, safe, and efficient removal of all children and staff, with a primary focus on minimising distress and maintaining child wellbeing.
- Lockdown procedures are designed to ensure all persons are contained safely within the building and grounds, protecting children from potential threats while providing a secure and reassuring environment
- The Emergencies Risk Assessment considers the unique aspects of the service location, including the safety and accessibility of evacuation routes for all children, particularly those with mobility challenges.
- The emergency kit is audited and restocked regularly to ensure it is equipped with items that meet the diverse needs of the children, including but not limited to food, water, medications, and resources for comfort and distraction that are culturally and developmentally appropriate.
- Assembly areas are assessed for their suitability in all weather conditions and their ability to provide a safe, calm, and contained environment for children, protecting them from further exposure to the emergency and onlookers. Particular consideration will be given to the needs of children with sensory sensitivities and anxiety, ensuring the assembly area is as quiet and calm as possible.

Lockdowns and Shelter in Place

A lockdown emergency response is initiated where the threat or hazard is in the external environment.

Lockdown plans will be developed with a specific focus on the emotional and physical safety of children. It will include strategies for calming and reassuring children during a lockdown, such as reading a story, singing songs, or providing quiet activities.

The plan will outline how to respond to situations involving a violent or potentially violent individual while prioritising the safety of children. This includes specific guidance on how to manage such situations in a way that minimises children's exposure and distress.

In line with child safe practices, the plan will explicitly mention that any staff member with concerns about a child's safety, including threats from a parent or guardian, must report these concerns immediately to the Nominated Supervisor and follow all relevant child protection procedures.

Educators must ensure that all entrances for buildings used in lockdowns are kept clear to enable a quick entry in the event of an emergency. The rooms selected for lockdowns are chosen based on their capacity to safely contain children and educators. Clearance of emergency exits and entrances will be included on the daily safety checklists.

Emergency Evacuation and Lockdown Plans

All plans will be based on an assessment of hazards and the types of emergency situation that may arise, including the possible consequences and controls to manage the identified risks. All staff are encouraged to inform the development of these plans with consultation and feedback sourced following each drill.

The plan will document the service floor plan, clearly marking all accessible escape routes and designated safe spaces for children with diverse needs. All plans will identify a primary escape route out of each area as well as a secondary path if the first route is blocked. Two ways out of each area will always be identified, with consideration for using windows if available. Plans will explicitly state that the safety, supervision, and wellbeing of children is the paramount priority over all other considerations, including the salvage of property.

Emergency plans will also outline procedures for communicating with parents and families in a culturally sensitive manner, ensuring they are informed promptly and accurately about their child's safety and location. The plan will also address how to support and care for children and staff after an emergency, including access to debriefing and appropriate support services.

Additionally, consideration will be given to the implications of an extended lock-down period for up to several hours and what additional resources may be required in the emergency evacuation and lockdown kit if this was the case. Another consideration may be the need for access to toilet facilities so you may choose a room close to these facilities.

The Emergency Evacuation and Lockdown Plan will be displayed in a prominent position at each identified exit used for evacuations out of the Service buildings.

Emergency Situations - Severe Weather Events

Floods/Flooding

The service's flood emergency plan will prioritise the immediate safety and emotional wellbeing of children and will be developed and updated in consultation with children, families, and educators to ensure that all voices are heard and that the plan is comprehensive and child-focused.

Prior to a severe weather event, families will be contacted to collect their child/ren as soon as an emergent threat is identified or when emergency services issue a 'Watch and Act' warning for the school or local area as the Service may be impacted during storms with significant rainfall. This proactive approach ensures children are with their families before conditions become dangerous.

Storms/Cyclones

Care will be suspended if the Service premises is affected by the following, as these conditions pose a direct risk to a child's health and safety:

- Power loss that impacts lighting, ventilation, and the ability to maintain a safe and hygienic environment (e.g., food storage, refrigeration, hot water).
- Structural damage to the premises (e.g. roof, walls) or debris in outdoor areas that would prevent children from moving and playing safely.

Emergency Situations – Environmental Factors

Onsite emergency

When an on-site hazard, such as a fire or chemical spill, requires children to move away from danger, the Emergency Evacuation Plan will be initiated. The service's evacuation method is designed to be consistent with school procedures to ensure a seamless and familiar process for the children. In an emergency, the educator who discovers the hazard will immediately raise the alarm. The paramount priority is the safe and efficient evacuation of all children and staff.

While trained staff may attempt to extinguish a very small fire, this will only be done if it does not compromise the primary goal of evacuation. The Nominated Supervisor, or the Responsible Person in Charge will lead the response, ensuring all procedures are followed with a focus on maintaining a calm and reassuring environment for the children.

Bushfires

Services in bush fire prone areas will have emergency procedures in place that prioritise the safe evacuation and wellbeing of children above all else. The Nominated Supervisor will ensure the service premises are clear of any fire hazards to protect the children and the Service from potential harm.

On days declared as Severe, Extreme, or Catastrophic fire days, the Nominated Supervisor, in consultation with the Approved Provider, will make a determination on closing the service. This decision will be made with the paramount consideration of child safety, ensuring children are not in a high-risk area.

Burst Water Main or Pipe

If the burst water main results in a significant loss of water, care cannot be provided as it directly impacts the health, hygiene, and wellbeing of the children. Families will need to be called to collect their child to ensure their basic needs are met.

Care may continue for a temporary loss of water (no more than 3 hours) if the situation can be quickly and safely rectified without compromising a child's safety or comfort.

Emergency Situations – Human Factors

Violent or Potentially Violent Individual

The safety of children is the non-negotiable priority in any situation involving a violent or potentially violent individual.

If the individual is outside the premises, a lockdown will be initiated to secure children in a safe, hidden location. If the individual is inside, a code phrase will be used to initiate a lockdown and quietly and discreetly move children away from the threat to an area that is not in direct sight of the service entrance.

No staff member is to attempt to physically remove or engage with an unwanted or harassing individual. The focus is on protecting the children, not confronting the threat.

Bomb Threat

An action plan and checklist will be readily available. In the event of a bomb threat, the staff member who answers the call will prioritise the safety of all children and staff.

Without alarming the caller, another staff member will be alerted to immediately initiate a silent and swift evacuation of the building, according to the emergency procedure. A separate phone will be used to contact 000 (police) to report the threat, ensuring that emergency services are involved as quickly as possible to protect the children.

Emergency Situations - Animal Management

Snakes

The Service is committed to providing a safe and healthy environment for children and staff. We will minimise the risk of injury from a snake bite by teaching children in an age-appropriate, non-alarming way how to respond to a snake sighting. The focus is on empowering children with knowledge without causing unnecessary fear.

Daily inspections will be conducted before children access outdoor areas to ensure they are free from hazards. The Nominated Supervisor will ensure any long grass around the boundaries is cut short to ensure clear visibility.

Unidentified Dog

The safety of the children is the primary concern. The Nominated Supervisor/Responsible Person will be notified immediately, and educators will calmly and quickly guide children away from the animal and to a safe indoor area.

Children and educators should never approach the animal. If the animal remains a threat, the local council will be called for immediate assistance to ensure the area is secure before children return.

Managing Education and Care in an Emergency

The Nominated Supervisor will be guided by Emergency Services at all times as the safety and wellbeing of the children is the highest priority. No one will be permitted to re-enter a building until emergency services have confirmed it is safe.

During a prolonged wait, educators will actively attend to the emotional and physical needs of the children. This includes providing comfort, reassurance, and distraction, such as reading a story or singing songs, to help minimize their distress. The Service will also ensure children's basic needs, such as access to water and the use of the toilet, are met in a safe and supervised manner. Educators will work to maintain a sense of calm and routine to support the children's wellbeing until the emergency situation is over.

In every emergency situation, the process of accounting for all children is a critical and immediate priority. An accurate and up-to-date attendance roll will be a primary resource, and a physical headcount will be conducted at every stage of the emergency response to ensure every child is accounted for.

If a child is unaccounted for, an immediate and thorough search will be initiated by designated staff, with the focus on locating the child safely. If a child remains unaccounted for upon the arrival of emergency services, they will be notified immediately, and all available information will be provided to assist in a rapid search and rescue effort.

Where the relevant authority has deemed it safe to return, educators and children will return to the program. Upon return, educators will provide comfort and reassurance, acknowledging any feelings the children may have about the emergency. A calm and supportive environment will be established to help children feel secure.

Where it is not safe to return to the service premises, and no other suitable approved learning environment is available, the Nominated Supervisor will contact parents/guardians to collect their child from the emergency assembly location. This communication will be done promptly and with empathy, ensuring families are reassured about their child's safety.

The Nominated Supervisor will notify the Approved Provider and Regulatory Authority via procedures detailed in policy [7.7 Managing Notifications](#).

Emergency Training and Induction

Before an educator or volunteer commences any duties, they are to know the steps carried out in a relevant emergency situation. Emergency training will include information on child safety, cultural safety, and trauma-informed practice during emergencies. This will ensure educators are equipped to respond to children's emotional and physical needs effectively.

Training will also include how to use emergency equipment and how to account for every child in a calm and systematic way, especially those who may be hiding or are non-verbal. Induction will include a clear explanation of our child safe practices and how they apply to all emergency procedures, including the location of relevant alarms and communication methods.

Emergency Drill Rehearsals

Rehearsal of emergency evacuation and lockdown procedures will be carried out at least once a term. Both the emergency evacuation and lockdown drill will occur during a BSC session, ASC session, and at the beginning of each Vacation Care program. To maximise the exposure to the widest range of children, families and staff in attendance, a drill will occur on different days of the week.

Drills will be conducted in a way that is age-appropriate and minimizes fear or anxiety for children. This may include using a calm and reassuring tone, explaining the purpose of the drill in simple terms, and providing positive reinforcement.

Drills will be documented using the *Emergency Drill Evaluation* to capture not only the timing and logistics but also who was present and observations about how children responded, and what strategies were effective in supporting their wellbeing. The debriefing process with children will be a key part of each drill, providing an opportunity for children to ask questions and express their feelings in a safe space.

Issues identified in an emergency rehearsal will require the risk assessment to be reviewed and endorsed by the Approved Provider. The Nominated Supervisor will be responsible for facilitating this process. All records of emergency drills will be maintained and securely stored by the Nominated Supervisor.

Communication with Families

Communication with families will be conducted in a sensitive and reassuring manner, respecting diverse cultural backgrounds and family structures. This includes providing information in multiple languages where necessary and offering opportunities for families to discuss their child's experience.

The service will have a clear communication protocol for notifying parents and guardians of the safety of their children during and after a real emergency, utilising multiple channels (e.g., text, email, phone calls) to ensure all families are reached.

Quality Improvement

Emergency plans will continue to be monitored for effectiveness. The risk assessment for emergency situations will be reviewed at least annually or as soon as practicable after any incident or drill, with a specific focus on its effectiveness in protecting the safety and wellbeing of all children.

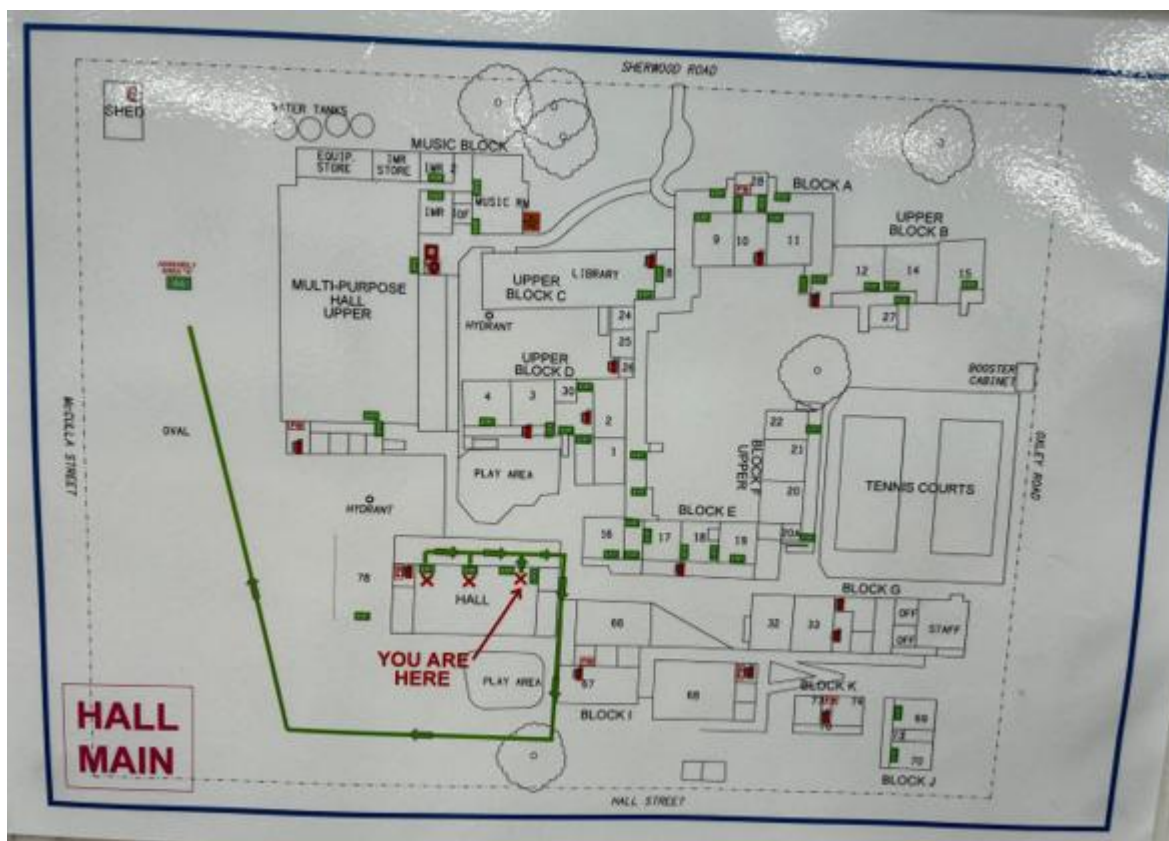
This review process will actively seek feedback from educators, staff, children, and families, ensuring a collaborative and child-centred approach to continuous improvement. Any concerns will be communicated to the Approved Provider along with the Nominated Supervisors plans to address these concerns

Evacuation Plan

Principles for Evacuation Plan Response

- R** – Remove children and others from danger
- A** – Alert, call out in a loud voice, sound alarm and call 000
- C** – Confine the fire. Close doors and windows, if safe
- E** – Evacuate to the Assembly Area

Steps to follow in the event of a fire or other relevant danger		
Step	Responsible Person	Instructions
1	All educators	Maintain awareness of your location and scan for potential hazards. Identify hazard and determine type (i.e. fire, animal etc.)
2	Responding Educator	When a relevant emergency presents (fire etc), sound alarm to alert all students, teachers, educators, and service/site visitors.
3	All educators and children	On hearing the alarm, every educator needs to prepare children to evacuate - muster all children located in their supervised area, directing them to gather (in a line) at the nearest exit point. Once all children are gathered the group will calmly transition to the Assembly Point (as marked on the Evacuation Floor Plan), with the relevant educator taking the lead.
4	Nominated Supervisor (or Responsible Person)	Put on warden hat and high visible vest, gather emergency medication, evacuation kit and sign in/out record.
5	Lead Educator	One educator from each location leads the children to the relevant Assembly Area.
6	Nominated Supervisor (or Responsible Person)	Check all rooms (including toilets) to ensure no children have been left behind. If safe to do so, close doors (leave unlocked) and windows, turn off air conditioners and TV. Meet all children and educators at assembly point.
7	Nominated Supervisor (or Responsible Person)	Once at assembly point, delegate an educator to call 000. Account for all children and educators with a roll call – reading out and visually confirming each person is present and safe. Apply first aid, if required.
8	All educators	Wait for emergency services to attend. Nominate an educator to meet emergency services in a prominent location
9	Nominated Supervisor (or Responsible Person)	No-one is to re-enter a building until emergency service have attended and deemed it safe to do so. Children will be cared for, supervised and comforted at the Assembly Area until it is safe. Where it is not safe to return to the service, and there is no other suitable approved learning environment for the children to gather, parents/guardians will be called to collect their child from the emergency assembly location at the earliest convenience.



Lockdown Plan

Principles for Lockdown Response

Communication – Discretely make others aware of the threat.

Coordination – Respond as a team to ensure the safety of children.

Care – Calmly approach the assembly of children to support safety and wellbeing.

Steps to follow in the event of harassment or unauthorised persons refusing to leave the premises

Step	Responsible Person	Instructions
1	All educators	Maintain awareness of your location and any unauthorised persons within the area.
2	Responding Educator	If an educator (or child) is being harassed, the closest observer will raise awareness to other educators to initiate a lockdown procedure by stating the CODE PHRASE over the walkie talkie.
3	All educators	On hearing the signal, each educator will calmly and quietly gather the children together, ready to escort them to an identified safe place. • If the threat is inside, children will be escorted outside by educators. • If the threat is outside, then children will be escorted inside by educators.
4	Lead Educator	Check other rooms and toilets to ensure all children are accounted for.
5	Responsible Person	Will immediately obtain and if possible record relevant information (e.g. physical descriptions, car registration etc.) on a service incident report.
6	Lead Educator	Will witness and provide back-up for the Nominated Supervisor/ Responsible Person in Charge but only if it does not place that person in a position of unacceptable risk or harm to themselves, to any child or to others, or leave children unsupervised.
7	Lead Educator	Once everyone is believed to be in the designated lockdown area, 000 will be called (if relevant) All children and educators will be accounted for with a head count and/or roll call – visually confirming each person is present and safe.
8	All educators	Depending on the circumstances, wait for— • emergency services; and/or • the threat to pass
9	Responsible Person	No one is to leave a lockdown assembly area until it is deemed safe to do so – by Nominated Supervisor/ Responsible Person or emergency services (if relevant)

Steps to follow in the event of an outdoor or other external danger (e.g., storm, intruder, fire, bomb, gas leak) - where children are to be escorted inside

Step	Responsible Person	Instructions
1	All educators	Maintain awareness of your location and scan for potential hazards.
2	Responding Educator	When a relevant emergency presents (outdoor or other external danger), raise awareness to other educators over the walkie talkie. If possible, record relevant information (e.g. physical descriptions, car registration, etc).
3	All educators and children	On hearing the signal, each educator needs to prepare children to transition to the lockdown area. Assemble the children in an orderly manner and move towards the inside lockdown area.
4	Lead Educator	Check other rooms, toilets, storage rooms and near-by buildings on the premises (if safe to do so), to ensure all children are accounted for.
5	Responsible Person	Collect sign-in sheets and parent/guardian contact numbers and once all children are inside, lock the doors (only if appropriate and able to do so). Where possible, draw curtains/blinds.
6	Lead Educator	As children arrive inside, assemble in the safest area and encourage children to be calm and sit still.
7	Responsible Person and Educator	Once everyone is believed to have arrived, delegate an educator to call 000 (if relevant). Account for all children and educators with a roll call – reading out and visually confirming each person is present and safe.
8	All educators	Depending on the circumstances, wait for— • emergency services • the threat to pass (storm etc).
9	Responsible Person	No one is to leave a building until emergency services have attended and deemed it safe to do so. When the threat is removed the children may be debriefed before returning to their activities.

Bomb Threat Action Plan

Principles for a Bomb Threat Response

Communication – Maintain contact to collect and record helpful information..

Coordination – to evacuate or assemble in a safe area.

Steps to follow in the event of a bomb threat situation

Step	Responsible Person	Instructions
1	Staff member answering the phone	Locate the bomb threat checklist and record key information. Do not hang up the phone. Signal to an educator (without alerting the caller) to commence evacuation procedures.
2	Supporting Educator	Raise the awareness of an evacuation.
3	All educators and children	On hearing the signal for emergency evacuation, each educator needs to prepare children to evacuate - muster all children located in their supervised area, directing them to gather (in a line) at the nearest exit point, ready to leave to the Assembly Area .
4	Responsible Person/ Supporting Educator	Put on warden hat and high visible vest, gather emergency medication, evacuation kit and sign in/out record.
5	Lead Educator	One educator from each location leads the children to the relevant Assembly Area .
6	Responsible Person/ Supporting Educator	Check all rooms (including toilets) and other buildings/areas on the premises to ensure no children have been left behind. If safe to do so, close doors (leave unlocked) and windows. Meet all children and educators at assembly point .
7	Responsible Person/ Supporting Educator	Once at assembly point, designate an educator to call 000. Account for all children and educators with a roll call – reading out and visually confirming each person is present and safe.
8	All educators	Wait for emergency services to advise further actions.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.86 Notification to parents of incident, injury, trauma and illness
 - R.87 Incident, injury, trauma and illness record
 - R.97 Emergency and evacuation procedures
 - R.98 Telephone or other communication equipment
 - R.99 Children leaving the education and care service premises
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.173 Prescribed information to be displayed
 - R.176 Time to notify certain information to Regulatory Authority
 - R.177 Prescribed enrolment and other documents to be kept by approved provider
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Fire and Emergency Service Act 1990 \(Qld\)](#)
- [Building Fire Safety Regulation 2008 \(Qld\)](#)
- [Managing the Work Environment and Facilities Code of Practice](#)
- <https://www.getready.qld.gov.au/alerts-and-warnings>
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [2.1 Providing a Child Safe Environment](#)
- [2.3 Safe Arrivals and Departures of Children](#)
- [2.4 Incident, Injury, Trauma and Illness](#)
- [2.5 Administration of First Aid](#)
- [2.7 Infectious Diseases](#)
- [2.8 Hygiene, Health and Wellbeing Practices](#)
- [2.9 Medical Conditions in Children](#)
- [2.10 Administration of Medication](#)
- [3.5 Emergency and Safety Equipment](#)
- [5.2 Positive Behaviour Support Practices](#)
- [7.4 Leading Compliance and Quality Assurance](#)
- [7.7 Managing Notifications](#)

Forms and Resources

- [Emergency Situations Risk Assessment](#)
- [Bomb Threat Checklist](#)
- [Emergency Drill Evaluation](#)

Policy 2.13 Emergency Evacuation, Lockdown and Drills		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Address regulatory changes		
V1-06.2024 – No updates		
V2-03.2025 – Added information for all roles and responsibilities and families, additional procedures relevant to, emergencies risk assessments including lockdowns and shelter in place, emergency evacuation and lockdown plans, emergency situations including severe weather, animal management, environmental factors and human factors and communication with families		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, additional procedures relevant to emergencies risk assessment, lockdowns and shelter in place, emergency evacuation and lockdown plans, emergency situations, managing education and care in an emergency, communication with families, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

2.14 Child Protection and Mandatory Reporting

Policy Statement

The Service is committed to safeguarding the wellbeing and safety of every child in our care. In addition to providing a secure and nurturing environment, we have a non-negotiable obligation to report any reasonable suspicion of harm or risk of significant harm. We recognise that our educators and staff are uniquely positioned and hold a profound responsibility to identify concerns about a child's safety and wellbeing, not only within our OSHC setting but also in other contexts.

The Child Protection Act 1999 (section 13E) clearly designates education and care professionals as mandatory reporters. Should an educator (or the Approved Provider) form a reasonable suspicion that a child has been harmed, is being harmed or is at risk of being harmed and may not have a parent/guardian willing and able to protect, they are legally and ethically required to respond with urgency. This information (a reasonable suspicion) must be appropriately managed and promptly reported to Child Safety.

As Queensland has a relevant child protection law that requires educators to report reasonable suspicions, the Approved Provider has a critical duty to advise all educators of the Child Protection Act 1999 and their obligations for mandatory reporting (Regulation 84). The service's procedures ensure this vital information is covered through induction and is regularly reinforced through comprehensive, periodic training, reflecting a commitment to continuous learning in child safety practices.

While the primary purpose of this policy is to address the requirements of mandatory reporting and empower educator's in making informed judgements based on observations and insights, the policy also outlines the clear process for reporting any harmful incidents that may occur within the Service itself, reinforcing our zero-tolerance approach to child abuse.

The Service recognises that there are various types of abuse and harm a child may be exposed to including—

- **Physical abuse** – non accidental injury including beating, shaking, burning, biting, causing bruise or fractures by inappropriate discipline, giving children alcohol, drugs or inappropriate medication.
- **Emotional or psychological abuse** – hostile parenting, constant yelling, insults, swearing, criticism, bullying, scapegoating, exposure to domestic violence.
- **Neglect** – failure to provide basic needs including food, clothing, enough sleep, hygiene, medical care, and supervision.
- **Sexual abuse** - exploitation, penetration, sexual touching, sexual talk/conversations and/or exposing children to pornography.

The Queensland Child Safe Standards provide a robust framework for creating child safe organisations and are designed to drive deep cultural change and to consistently create, maintain and improve child safe practices. When organisations apply the Standards, they build a culture where abuse of children is actively prevented, effectively responded to and diligently reported. The Service is fully committed to maintaining a proactively child-safe environment by demonstrating adherence to both National and Queensland specific Child Safe Standards through robust policies, clear procedures, consistent practices and strong governance across all levels of the Service.

Under the Education and Care Services National Law and Regulations, penalties may apply to:

- Approved providers in relation to ensuring Educators are advised of the existence and application of child protection law and any obligations they have under this law,
- Educators in relation to the protection of children from harm and hazards.

The Approved Provider and all Educators will follow the Approved Provider's Child and Youth Risk Management Strategy to ensure all children are kept safe from risk of harm and their wellbeing is prioritised at all times.

Roles and Responsibilities

Approved Provider	• Prioritise and embed safeguarding children as the core principle of all service operations and notify/report any inappropriate interaction with a child or children in our care to the relevant authorities. • Ensure all educators, staff, students and volunteers have comprehensive knowledge of and strictly adhere to this policy, fostering a culture of shared responsibility for child safety. • Ensure families are made aware of this child protection policy and the Service's commitment to child safety, fostering transparent communication and partnership. • Ensure all educators', staff, volunteers' and students' Working With Children Checks are validated and their eligibility is confirmed BEFORE they begin working with children unless they meet specific criteria for exemption from a WWC Check (records must include WWC Check number and expiry date). • Ensure any Nominated Supervisor, responsible person in day-to-day charge, staff member and volunteer have successfully completed an approved child protection course approved by the Regulatory Authority. • Ensure all members of the Approved Provider, Nominated Supervisor, Educators, volunteers and students have successfully completed Child Safety Training as per s.162B of the National Law • On employment educators are required to participate in a comprehensive induction and orientation program, that includes a thorough understanding of child protection law, mandatory reporting obligations, and the Queensland Child Safe Standards • Educators, staff, students and volunteers are provided with annual, mandatory, and ongoing child protection training and supervision to ensure they fully understand that child safety is everyone's responsibility, and they consistently adhere to the Child Safe Standards • Ensure staff receive appropriate and up to date training and induction to be able to identify and effectively respond to indicators of significant harm. • Ensure no member of the Approved Provider, Nominated Supervisor, staff member or volunteer subjects a child to conduct that a reasonable person would consider inappropriate while in the care of the Service. • Consult, support and plan appropriate and timely courses of action when suspicions of abuse and harm arise, always prioritising the child's best interests. • Seek advice, guidance and resources to support decision-making. • Implement secure systems to keep a confidential record of each child and any child protection incident in accordance with regulatory requirements and privacy legislation. • Notify the Regulatory Authority through the NQA-ITS (within 24 hours) of any incident where it is reasonably believed that physical and/or sexual abuse of a child has occurred or is occurring while the child is being educated and cared for by the service, demonstrating immediate and transparent accountability.
Nominated Supervisor	• Actively promote a supportive and reflective workplace culture that prioritises child safety and wellbeing, creating opportunities for open dialogue and collaboration among colleagues to continually enhance practice. • Successfully complete child protection and child safety training to meet the requirements of s.162A and s.162B of the National Law. • Ensure no child is subjected to conduct that a reasonable person would consider inappropriate while in the care of the Service. • Educators, staff, volunteers and students are well informed about the different ways children may express concerns, distress and disclose harm as well as the sensitive and appropriate process for responding to disclosures from children- including a complaint that alleges a child is

	exhibiting sexual behaviours that may be harmful to the child or another child. • Ensure the Incident, Injury, Trauma and Illness Record is accurately completed and lodged within 24 hours of any child abuse incident that occurred while the child was in care. • Respond to concerns and issues raised by staff with empathy, respect and a commitment to immediate action where necessary. • Contact the police on 000 if there is an immediate danger to a child and intervene if it is safe to do so. • Direct serious concerns and possible suspicions to an appointed officer of the Approved Provider for urgent consideration and decisive action. • Document all concerns and ensure these records are handled with the utmost privacy and confidentiality, protecting the child's identity and sensitive information. • Where appropriate, collaborate with parents/guardians to identify preventative supports, fostering a partnership approach to child protection when safe and appropriate to do so. • Set high expectations for educator conduct, recognising the value of educators work and proactively supporting their wellbeing amidst challenging circumstances.
All Staff	• Successfully complete child safety training to meet the requirements of s.162B of the National Law. • Participate in a comprehensive induction and orientation program, including an understanding of child protection law and the Queensland Child Safe Standards. • Be able to accurately recognise and respond to indicators of abuse to children and young people through active participation in annual, compulsory child protection training • Always respect what a child discloses, taking it seriously, believing the child and following up on their concerns through the appropriate channels. • Comprehend their obligations as mandatory reporters and their legal requirement to report all reasonable beliefs that a child has been sexually abused or is the subject of sexual abuse without hesitation or delay. • Share concerns promptly and appropriately with the Nominated Supervisor, or where relevant, other professionals. • Ensure no child is subjected to conduct that a reasonable person would consider inappropriate while in the care of the Service. • Actively promote the welfare, safety, and wellbeing of children by consistently creating and maintaining child safe environment that is welcoming, inclusive, and empowering for all children. • Intervene immediately and decisively to protect children whenever harmful actions are observed, or if another educator is observed needing assistance in a child protection matter. • Report any inappropriate interactions with children to the Nominated Supervisor or Responsible Person in charge without delay, ensuring swift action is taken. • Regularly reflect on own practice and participate in the continuous development and improvement of safeguarding culture at the service.

Key Tasks and Responsibilities

Child Protection Training	The Approved Provider must ensure relevant up-to-date and accessible materials and resources are available for the Nominated Supervisor to instruct educators of the awareness of child protection law and mandatory reporting duties. This training will be practical, scenario-based, and focused on empowering educators to act confidently.

Supervising Educator conduct	The Approved Provider and Nominated Supervisor play the primary role in supervising the behaviour of people in care of children, ensuring they are consistently meeting the expectations set out in policy and the Queensland Child Safe Standards. Should concerns be raised, the Approved Provider is responsible to ensure appropriate and timely management action is carried out, including disciplinary measures where warranted. The Nominated Supervisor should immediately communicate all serious concerns to the Approved Provider to ensure they are aware and can provide necessary oversight and support.
Observing children's wellbeing and experiences	All educators are responsible for observing and actively looking for signs a child may be in need of protection. They are to promptly report their concerns to the Nominated Supervisor (or other relevant leader) to ensure action is taken to assess reporting requirements or other supports.
Reporting harm	Any educator can report suspicions of harm, however, the typical process should be via the Nominated Supervisor to ensure incidents are documented, handled appropriately, and reported consistently with legislative requirements.

Procedures

For the purpose of this policy, harm to children is considered as being categorised as:

- Harm caused by an employee of the Approved Provider,
- Harm caused by another child, whether they be attending the Service or not,
- Harm caused by a person not employed by the Department or the Approved Provider including family members, strangers, parent helpers, volunteers, school visitors or unknown people,
- Self-harm.

In keeping with this policy, all Volunteers and employees must:

- Never cause harm to children in the care of the Service through action or inaction,
- Actively seek to prevent harm to a child in the care of the Service,
- Immediately report suspected harm to the Nominated Supervisor or Responsible Person (or to an executive member of the Approved Provider, if it is suspected the Nominated Supervisor is involved),
- Inform themselves about the content of this policy and procedure and their personal obligations under it,
- Abide by the 'Standards of Behaviour' as set out in policy [5.1 Interactions and Relationships with Children](#), which are designed to foster respectful and safe interactions.

Child Safe Principles and Standards

The Approved Provider is committed to ensuring the safety and well-being of all children in our care through adherence to the National Principles for Child Safe Organisations and specifically, the Queensland Child Safe Standards. This commitment aims to create an environment where children's safety and wellbeing is paramount ensuring they feel respected, valued, and empowered to speak up.

The Service's policies and procedures have been developed to ensure our Service:

- Promotes a genuinely child-centred culture to consistently prioritise the best interests and voices of children in all decisions and actions,
- Embeds a zero-tolerance approach to child abuse in all its forms, ensuring swift and decisive action is taken when concerns arise.
- Empowers children to actively participate in decisions affecting them, fostering their agency and ensuring their perspectives are heard and valued in matters concerning their safety.

Relevant policies include (but are not limited to) [1.2 Documenting Children's Learning](#), [1.3 Sharing the Program and Children's Progress with Families](#), [2.16 Safe Use of Digital Technologies and Online Environments](#), [2.17 Child Safety and Wellbeing](#), [4.1 Recruitment and Employment of Educators](#), [4.5 Volunteers and Students](#), [6.7 Feedback and Complaints Handling](#), [6.11 Cultural Safety](#), [7.5 Governance and Management](#).

The Service is dedicated to continuous improvement in child safety, regularly reviewing and updating our practices to uphold the highest standards of child safety and wellbeing.

Service Practices Relevant to Reportable/Inappropriate Conduct

To comply with legislation and ensure a child safe environment, the Service will ensure all educators, staff, volunteers and students are advised of current child protection law and fully understand their obligations under the law.

All educators will be expected to follow the instruction and procedures to ensure children's safety and wellbeing. The Approved Provider has zero tolerance for conduct that risks or otherwise harms children attending OSHC, with significant disciplinary action, including potential termination, as a consequence of any substantiated incidents and mandatory reporting to the Regulatory Authority within the prescribed timeframe.

As per s.166A of the *Education and Care Services National Law*, the Approved Provider, Nominated Supervisor, Educators and volunteers must not subject a child being cared for by the Service to conduct that a reasonable person would consider to be inappropriate within an education and care service. In addition, Approved Providers and Nominated Supervisors must also ensure that no child is subjected to conduct that a reasonable person would consider to be inappropriate.

All management (with direct contact of children or young persons), educators and staff are mandatory reporters and have a legal obligation to make reports if they suspect, on reasonable grounds, a child is at risk of significant harm. Neglecting these obligations could potentially be deemed a criminal offence with serious consequences.

To proactively protect children and young people and ensure their safety, welfare and wellbeing, the Service management is responsive to report allegations or convictions of harm or risk of harm to a child or young person and child related misconduct by any staff member, educator, volunteer or contractor to the relevant organisation or Department of Child Safety.

The Service is committed to providing comprehensive support to children, young people, families, educators or staff who have made a report regarding child protection, with a focus on upholding strict confidentiality throughout the process. Our primary concern is the wellbeing and safety of the child, and we will work closely with relevant authorities, professionals, and support networks to ensure that the child's best interests are met throughout the process. Our dedicated support system will assist educators and staff in navigating this challenging process while safeguarding their privacy and professional wellbeing.

Responding to Harm Occurring at OSHC

The Service is committed to safeguarding the protection and wellbeing of children. In circumstances where an OSHC employee or volunteer is alleged to have harmed a child (in any nature), the following will occur—

1. Any educator being aware or holding suspicion will immediately report to the Nominated Supervisor (or responsible person), who will notify the Approved Provider.
2. The educator accused or suspected to have harmed a child will be immediately relieved of their duty and suspended with pay pending a thorough workplace investigation to ensure the safety of all children.
3. The parent/guardian and Regulatory Authority will be notified at the earliest convenience, following the procedures set out in policy [7.7 Managing Notifications](#). Likewise, recording the incident as set out in policy [2.4 Incident, Injury, Trauma and Illness](#) will be carried out.
4. The workplace investigation will be carried out by a suitably experienced, qualified and impartial person, ensuring relevant lawful requirements are followed.
5. Subject to the information available, service leaders will consider any duties for additional reporting (e.g. police).
6. Where the allegation of harmful conduct is substantiated, significant disciplinary action – almost certainly termination - will occur, demonstrating our firm commitment to child safety.

Child in Need of Protection - Mandatory Reporting

Informed of Child Protection Law and Mandatory Reporting (Regulation 84)

The Nominated Supervisor is responsible for the management of induction tasks. The induction materials of the service provide clear and comprehensive instruction for each educator to understand the existence of the Child Protection Act and their responsibilities to notify any reasonable suspicion of harm.

The Service complements initial guiding material with more robust and practical training opportunities to better equip educators with relevant skills and knowledge to identify and effectively respond to indicators of abuse and harm.

The Nominated Supervisor is to lead a supportive culture that encourages and ensures educators can seek out immediate support and guidance from the Service's leaders where questions, concerns or suspicions arise regarding child protection.

At all times educators will have access to the Service's policies and procedures manual to refer to their responsibilities or required actions.

Responding to Disclosures

Where a child discusses information relating to their experience of trauma and harm with an educator (a disclosure); educators are guided to respond with sensitivity and adherence using the following principles:

- **Listen** – try to be in a suitable environment, be calm and patient, give the child or young person your full attention, let the child use their own words and avoid quizzing or leading questions. Don't be afraid of saying the 'wrong thing'. Listening supportively is more important than the words you use.
- **Reassure** – address the concern about the child's safety and reassure the child it's okay that they have told you what's been happening. Reassure the child it is not their fault for any distress or abuse they have experienced.
- **Respect** – the child may only reveal some details. Acknowledge their bravery and strength in disclosing. Honestly tell the child or young person what you plan to do next, in a way they can understand. Tell the child/young person they have done the right thing in revealing the information and that you will help them tell someone who can help keep them safe.

Educators must not attempt to conduct their own investigation or mediate an outcome between the parties involved and **MUST NOT** confront the perpetrator.

Developing a Reasonable Suspicion

An educator or any relevant staff member may develop concerns about a child's wellbeing and safety from a variety of sources – observations, discussions, the child's presentation, behaviour, or interactions with the parents/guardians etc.

A reasonable suspicion might not develop from one single event but rather a series of indicators combining to result in a concern developing about a child's safety and wellbeing. The key features for a suspicion to signal a child is in need of protection is —

- a child has suffered, is suffering, or is at unacceptable risk of suffering, significant harm, and
- may not have a parent/guardian able and willing to protect the child from the harm.

While the Child Protection Act 1999 emphasises physical and sexual abuse for mandatory reporting requirement, educators are also encouraged and empowered to report a child in need of protection caused by any form of abuse or neglect.

Regardless of a concern reaching the threshold of serious harm, educators (or any other staff) are to promptly advise the Nominated Supervisor (or Responsible Person) of any substantial concerns or circumstances relating to a child's safety or wellbeing, ensuring early intervention and support.

A reportable suspicion about a child is a reasonable suspicion that the child has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical or sexual abuse; and may not have a parent able and willing to protect the child from the harm. Mandatory reporters should also report to Child Safety a reasonable suspicion that a child is in need of protection caused by any other form of abuse or neglect.

Confidentiality

It is important that any notification remains confidential, as it is vitally important to remember that no confirmation of any allegation can be made until the matter is investigated. The individual who makes the notification should not inform the suspected perpetrator (if known). This ensures the matter can be investigated without contamination of evidence or pre-rehearsed statements. It also minimises the risk of retaliation on the child for disclosing.

Consultation and Decision-Making

Indications of significant harm are not always clear. All staff should be prepared to discuss their suspicions openly (with the appropriate designated people) to ensure a child is supported and reporting obligations are met.

Educators are protected from liability and do not breach privacy when sharing confidential information, if they are acting honestly and if their actions in sharing information are consistent with protecting children from harm.

The Nominated Supervisor, whether being told of or themselves developing concerns relating to a child's safety or wellbeing are to immediately advise an executive member of the Approved Provider (other members of the executive will be called when the President is unavailable).

The Nominated Supervisor and Approved Provider will consult to develop a comprehensive plan of action, which could include:

- discussing concerns with parents/guardians when it is safe and appropriate to do so and does not place the child at further risk,
- seeking further advice and support from:
 - Child Safety,
 - Child Protection Guide [online tool]
<https://secure.communities.qld.gov.au/cpguide/engine.aspx>
 - the school Principal/relevant other professional,
- directly report notification to Child Safety.

When making a report you will be asked to provide information about:

- Details about the child/young person and family,
- The reasons you are concerned,
- The immediate risk to the child,
- Whether or not the child or family has support,
- What may need to happen to make the child safe,
- Your contact details, so that the officer can call you to obtain further information if required or to provide feedback.

Failure to make a report can result in a fine of up to \$6,000. A person can be prosecuted within three (3) years after failing to make a report. After that, any action will be at the Attorney General's discretion.

Protection for Reporters

The identity of the reporter is protected by law from being disclosed, except in certain exceptional circumstances. Provided the report is made in good faith:

- The report will not breach standards of professional conduct
- The report cannot lead to defamation and civil and criminal liability
- The report is not admissible in any proceedings as evidence against the person who made the report
- A person cannot be compelled by a court to provide the report or disclose its contents
- The identity of the person making the report is protected.

A report is also an exempt document under the Freedom of Information Act 1989.

Documenting and Recording Information

Documenting a Disclosure

The Nominated Supervisor is to ensure that documentation of a disclosure/suspicion is written and recorded by the staff/educator involved as soon as practically possible, while ensuring the child's safety and wellbeing remain the priority. The report should include

- time, date and place of the disclosure,
- 'word for word' what happened and what was said, including anything they (the staff member/educator) said and any actions that have been taken,
- date of report and signature.

Recording Additional Information

The Nominated Supervisor is to ensure that additional information related to the suspicion/disclosure is documented and recorded as soon as practically possible, maintaining strict confidentiality. The report should include:

- any relevant background information
- service response to events
- any parent/guardian involvement or discussion
- any other matters considered relevant

These reports and other documentation will be stored by the Nominated Supervisor in a secure password-protected file on the service's computer (consistent with policy [7.6 Privacy and Confidentiality of Records](#))

Non-Reportable Concerns

Where advice has been received that the suspicion does not meet a threshold for reporting to Child Safety, the relevant person should follow and document any recommendations (e.g., talking to parents/guardians about access to support services)

However, the following matters should also be considered and if necessary actioned:

- Does the circumstance meet the definition of a serious incident - notifiable to the Regulatory Authority? – see policy [2.4 Incident, Injury, Trauma and Illness](#)
- How are parents/guardians best notified and supported with careful consideration for the child's wellbeing
- What action should be taken to support the child or safety care for children? – see [2.14 Child Protection and Mandatory Reporting](#)

Reporting Reasonable Suspicions

Where a report to Child Safety is necessary, the following communication methods can be used—

- If the child is in immediate danger – **QLD Police Service** – 000
- During business hours – **Child Safety Regional Intake Service**
- After Hours – **Child Safety After Hours** – 1800 177 135
- Online Reporting Form via Child Protection Guide - <https://secure.communities.qld.gov.au/cpguide/engine.aspx>

While Mandatory Reporters are required to make a written report. If the initial notification is made via phone, the corresponding report can be guided by Child Safety's instructions.

Managing Concerns of Harmful Sexual Behaviours in Children

The Service's policies draw upon the National Principles of Child Safe Organisations, recognising our role and obligation to addressing risks of harmful sexual behaviours proactively and with expertise.

The term 'harmful sexual behaviours' refers to a range of behaviours that are outside the expected range of sexual behaviour for a child or young person's level of development. Harmful sexual behaviours include but are not limited to—

- acts that problematic to a child's own development (compulsive masturbation or inappropriate nudity),
- violations of privacy,
- exposure to sexual materials, or

- forced or coercive sexual acts (such as sexual assault).

These behaviours are extremely serious as they can cause significant harm to other children. They can also be indicator of a child or young person having been harmed themselves and may place the child displaying such behaviours at risk of sexual exploitation.

Responding to Concerns of Harmful Sexual Behaviours in Children

While every effort is taken to reduce the likelihood of a child being exposed to harmful sexual behaviours, the Service remains aware of the possibility that it may occur and treats any concerns with the utmost seriousness and urgency.

Where an educator becomes aware of an instance of harmful sexual behaviour possibly occurring at the service, they will immediately follow the steps set out in [2.4 Incident, Injury, Trauma and Illness](#) to—

- a) Immediately redirect and ensure the safety of all children involved,
- b) Offer appropriate support to any children affected, and
- c) document the events.

Relevant parents/guardians will be notified of the incident at the earliest convenience (but within 24 hours) always prioritising the child's safety and wellbeing. Likewise, depending on the seriousness, notification to the Regulatory Authority may also be submitted. In holding concerns of harmful sexual behaviour, the Nominated Supervisor (or if timeline requires, Responsible Person) will assess the service's capacity to maintain the safety of children.

Should the Service reasonably believe children's safety or wellbeing may be risked, the child's enrolment will be suspended, pending further guidance, management action and planning, with the overriding goal of ensuring a safe environment for all children. Should any service representatives believe the child is need of protection, the steps set out within this policy will be followed.

Complaint of Harmful Sexual Behaviours in Children

Consistent with policy [6.7 Feedback and Complaints Handling](#), both children and parents/guardians can raise their concerns with a representative of the Service at any time. All representatives of the service (Nominated Supervisor, educators etc.) will treat any concerns or complaints seriously – taking immediate and appropriate action—

1. While the Nominated Supervisor is the preferred contact, upon receiving relevant concerns or complaints relating to harmful sexual behaviours (as defined in this policy), educators or other representatives, should immediately inform the Nominated Supervisor (or in their absence, the Responsible Person).
2. Details of relevant behaviours and incidents will be documented, using the Complaints Record.
3. The Nominated Supervisor (or Responsible Person) will notify a representative of the Approved Provider at the earliest convenience to develop a comprehensive and urgent response plan, including the person(s) responsible for specific tasks and will be based on the information available to—
 - a. Ensure the immediate safety of all children at the service.
 - b. Comply with all notification and/or reporting requirements to external authorities.
 - c. Collect relevant information to assess the veracity and severity of the complaint.
4. Should information indicate the safety or wellbeing of children attending the Service be at risk and is beyond the capacity of the service to ensure protection, the Service may decide to suspend the relevant child's enrolment, pending further guidance, management action (including an investigation) and planning as the safety of all children is paramount.
5. Parents/guardians of the child alleged to have displayed harmful sexual behaviours will be notified of the details of the concerns/complaint and offered relevant contacts for community support. Should the Service believe the child is need of protection, the steps set out in this policy regarding Mandatory Reporting will be followed.
6. Once relevant information and guidance has been collated and established, the Approved Provider, in collaboration with the Nominated Supervisor will determine the appropriate outcome to provide care that safeguards all children attending the Service, this may include but is not limited to the development of behaviour/care plans.
7. All documentation, communication and reports will be stored confidentially, as set out in policy [7.6 Privacy and Confidentiality of Records](#) - via a password protected system.

Sharing of Information

Sharing information is a key part of ensuring that vulnerable children are protected and supported. The *Child Protection Act 1999* sets out the legal framework for reporting concerns about children to Child Safety and referring families to Family and Child Connect and support services, including intensive family support services. It outlines information sharing rights and responsibilities between professionals, Child Safety and services that support children and families.

Sharing concerns and information about a family with the right service enables a comprehensive assessment, informs decision making and leads to better outcomes that ensure the child's safety. Sharing information can also facilitate a coordinated multi-agency response to families with multiple or complex needs.

Where possible, a family's consent to share information should be obtained. Written consent isn't needed to share information. A verbal agreement or acknowledgment is sufficient. Educators are advisable to document the conversation for the Service records.

The legislative provision that enables direct referrals without consent allows early support to be offered to the family before problems escalate and require statutory intervention. Sharing information takes precedence over a parent's right to confidentiality or privacy because the safety, welfare and wellbeing of the child is paramount.

Documentation and Record Keeping

Any record relating to suspicions of significant harm are to be kept separate from general incident reports, due to their highly sensitive nature. All records containing child protection concerns will be filed within the secure password protected location as set out in policy [7.6 Privacy and Confidentiality of Records](#).

In circumstances where it is consistent with protecting a child from significant harm, relevant information can be shared with the school Principal. The preference is the Service will inform this decision-making, however, in extenuating circumstances the Nominated Supervisor will have delegation to decide.

All persons involved in a case of suspected child abuse will be treated with sensitivity and respect, and all information to the case will remain confidential unless sharing information is legally required to protect a child from harm (refer policy [7.6 Privacy and Confidentiality of Records](#)).

Child Protection and Child Safety Training

All staff are provided with up-to-date and practical training about child protection law and their obligations under this law to ensure they are confident in following the reporting guidelines within Queensland and will adhere to our *Child Protection Policy* (Reg 84). Management will ensure compulsory training and development are provided for all educators, staff, and volunteers in child protection mandatory reporting on an annual basis.

All Nominated Supervisors, Responsible Persons, educators, students, volunteers and staff working with children must provide evidence of successful completion of an approved child protection training course to satisfy compliance with s162A of the Education and Care Services National Law Act.

The Approved Provider, Nominated Supervisors, Responsible Persons, educators, students, volunteers and staff working with children must complete the foundation National Child Safety Training modules within 14 days of commencement or before working directly with children (whichever is shorter) and complete child safety refresher training every two years.

Additional to the foundation training modules, the Approved Provider, Nominated Supervisors and Responsible Persons must complete the advanced National Child Safety Training modules within three months of commencement in their position.

Breach of Child Protection Policy

All educators, students, volunteers and staff working with children have a duty of care to support and protect children. A breach of our *Child Protection and Mandatory Reporting Policy* may include if a person:

- does something that a reasonable person in that person's position would not do in a particular situation
- fails to do something that a reasonable person in that person's position would do in the circumstances
- acts or fails to act in a way that causes harm to someone the person owes a duty of care.

A breach is any action or inaction by any individual within the Service, including children and young people, that fails to comply with any part of the policy. Educators and staff must ensure they take all reasonable steps to ensure children are protected from harm and hazard at all times education and care is provided at the service. Educators, staff and families are encouraged to discuss with management any concerns regarding situations that may compromise or breach professional boundaries that may place children at risk of harm.

Managing Breaches

Management will investigate any breaches to this policy in a fair, unbiased and supportive manner and may undertake an investigation if Child Safety or the Police are not conducting their own investigation or if their action has concluded.

Staff members or educators who fail to adhere to this policy may be in breach of their terms of employment. Visitors or volunteers who fail to comply to this policy may face termination of their engagement.

Depending on the nature of the breach outcomes may include:

- emphasising the relevant element of the child protection policy and procedure,
- providing closer supervision,
- further education and training,
- providing mediation between those involved in the incident (where appropriate),
- disciplinary procedures, including dismissal of employment, if required,
- reviewing current policies and procedures and developing new policies and procedures if necessary.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.162A Child Protection Training
 - s.162B Child Safety Training
 - s.166A Offences relating to Inappropriate Conduct
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.12 Meaning of serious incident
 - R.84 Awareness of child protection law
 - R.85 Incident, injury, trauma and illness policies and procedures
 - R.86 Notification to parents of incident, injury, trauma and illness
 - R.128B Child protection training
 - R.128D Foundation child safety training
 - R.128E Advanced child safety training
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.174A Prescribed information to accompany notice
 - R.175 Prescribed information to be notified to Regulatory Authority
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA4 – Staffing arrangements

- QA5 – Relationships with children
- QA6 – Collaborative partnerships with families and communities.

Additional Regulatory Context and Guidance

- [Child Protection Act 1999 \(Qld\)](#)
- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Criminal Code Act 1899 \(Qld\)](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)
- [National Principles | Child Safe Organisations](#)

Related Policies and Procedures

- [2.1 Providing a Child Safe Environment](#)
- [2.4 Incident, Injury, Trauma and Illness](#)
- [2.16 Safe Use of Digital Technologies and Online Environments](#)
- [2.17 Child Safety and Wellbeing](#)
- [4.1 Recruitment and Employment of Educators](#)
- [5.5 Promoting Protective Behaviours](#)
- [6.5 Interactions and Communication with Families](#)
- [6.7 Feedback and Complaints Handling](#)
- [7.1 Nominated Supervisor](#)
- [7.4 Leading Compliance and Quality Assurance](#)
- [7.6 Privacy and Confidentiality of Records](#)

Forms and Resources

[Information Sheet for Mandatory Reporting by Education and Care Service Professionals](#)

Policy 2.14 Child Protection and Mandatory Reporting		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V2-03.2025 – Added additional information to policy statement and all roles and responsibilities, additional procedures relevant to child safe standards, reportable conduct, confidentiality, protection for reporters, documenting and recording disclosures. Incorporated previous policy 2.18 Managing concerns of harmful Sexual Behaviours, added references to Child Safe Standards and Statement of Shared Commitment		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced key tasks and responsibilities, enhanced procedures and amended procedures relevant to child safe principles and standards, additional procedures relevant to sharing of information, additional regulatory context and guidance to align with child safe standards		
V4-04.2026 – removed duplicated information, enhanced roles and responsibilities, updated procedures relevant to service practices related to reportable conduct to include inappropriate conduct, added procedures relevant to child protection and child safety training		

2.15 Transportation (Other than Excursions)

Policy Statement

The Service does not provide or arrange transportation for children to or from the service and will only arrange transportation for the purpose of an excursion.

Any transportation arranged by a parent/guardian is not within the scope of this policy. To remove any doubt, the Service recognises children are considered to be under the care of an education and care service at the point the service is taken to assume responsibility for their care and wellbeing. The National Law and National Regulations will then apply at this time. To ensure the Approved Provider can reasonably discharge their responsibilities and duties for the safety, health and wellbeing of all children, the Service will only allow for transportation that is arranged or coordinated in any part by the service.

Key Tasks and Responsibilities

Initiating a change in proving transport	The Approved Provider will establish the policy and ability for the service to provide transport. Should they change their position, they will be responsible for coordinating the update to policy, procedures, risk assessments and notification.

Procedures

Should the Approved Provider make changes to their policy for providing transportation other than for excursions (including arranging transportation), then the following will occur—

1. A change in policy to comply with Regulation 102A-102F, including:
 - a. Development of risk assessment.
 - b. A process to obtain authorisation.
 - c. Procedures for embarking and disembarking the means of transport.
2. Notification to parents/guardians to the change in policy
3. Notification to the Regulatory Authority (within seven day) if there are changes to providing or arranging transportation.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.102A Application of Division
 - R.102B Transport risk assessment must be conducted before service transports child
 - R.102C Conduct of risk assessment for transporting of children by the education and care service
 - R.102D Authorisation for service to transport children
 - R.102E Children embarking a means of transport—centre-based service
 - R.102F Children disembarking a means of transport—centre-based service
 - R.168 Education and care service must have policies and procedures
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.175 Prescribed information to be notified to Regulatory Authority
 - R.176 Time to notify certain information to Regulatory Authority
- **National Quality Standard:**
 - QA2 – Children's health and safety

- QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [ACECQA - Safe transportation of Children Safety Checklist and regular transportation record](#)
- [ACECQA - Information sheet – Changes to regular transportation of children](#)
- [ACECQA - Information sheet - Guidance for adequate supervision during transportation](#)
- [ACECQA - Information sheet – Minimising the risk of children left in vehicles](#)

Related Policies and Procedures

[6.2 Enrolment and Orientation](#)

[7.6 Privacy and Confidentiality of Records](#)

Policy 2.15 Transportation (Other than Excursions)		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V1-03.2025 – No updates		
V1-10.2025 – No updates		
V1-04.2026 – No updates		

2.16 Safe Use of Digital Technologies and Online Environments

Policy Statement

This policy outlines the Service's commitment to actively protect children and safeguard their welfare in all online environments. As a service, we recognise the increasing use of digital platforms for learning, communication and recreation. We are dedicated to developing and implementing practices that create a secure online environment, where children—

- Are comprehensively guarded from all forms of harm and exploitation.
- Have their reputation, personal data and privacy protected.
- Are never exposed to inappropriate or harmful content.
- Are empowered with the knowledge and skills to navigate online spaces safely.

Guided by the Best Practice Framework for Online Safety Education and eSafety Early Years program for educators published by the eSafety Commissioner, this policy aims to balance the significant learning and engagement opportunities afforded by digital devices with our paramount responsibility to safeguard every child's wellbeing and best interests. The service's procedures will continuously be assessed, improved and adapted to evolving digital landscapes. We are committed to fostering genuine collaboration with children (and their families) to empower their active participation around the design and ongoing development of our protocols for safely using digital devices and engaging in online activities at the Service.

This policy applies to all children, staff, volunteers, and parents/guardians connected to the Service and covers all online activities, the use of online learning platforms and any digital interactions. The nature of technology means there are many opportunities for online environments to intersect with the service at several junctures and stakeholders including—

- Access to technology and the internet at the Service.
- The taking, storing, and sharing of photos and videos of children.
- Social media use by the broader community, including educators that may relate to the Service or its children.

The Approved Provider will ensure that all service owned computers and mobile devices that have internet access are fitted with advanced, regularly updated security and filtering software to prevent access to inappropriate information and harmful web sites.

Information technology that may be used at the service includes computer equipment for the use of music, dance, movies, information, and other relevant internet access for enhancing an activity. Use of other items such as cameras, iPad and Service-issued mobile phones are included.

The Service's policy sets out clear, explicit and non-negotiable expectations for the community to use and interact online in a manner that consistently maintains and enhances the safety and wellbeing of children. Anyone acting in a manner incompatible with our commitment to the safety and wellbeing of children will be subject to disciplinary action relevant to the circumstance, up to and including termination of employment or enrolment.

Definitions

Internet: refers to the world wide web of computer systems that facilitates the transmission and exchange of data. Information search engines and web browsers include, but are not limited to, Google, Firefox and Internet Explorer.

Social Networking Media: refers to any online tools or functions that allow people to communicate or share information via the internet. This includes, but is not limited to, applications such as Facebook, YouTube and Twitter.

Mobile device: refers to devices that have non-Wi-Fi internet access such as iPads, tablets, iPods, and mobile phones

ICT: information and communication technology.

Closed Circuit Television (CCTV): is visual surveillance technology that uses video cameras to transmit a signal to a specific, limited set of monitors. The term "closed circuit" signifies that the footage is not publicly broadcast but is instead monitored privately.

Cyber Safety: Safe and responsible use of the internet and equipment/devices, including mobile phones and devices

Cyber-bullying: involves the deliberate, repeated, and hostile use of information and communication technologies by an individual or group that is intended to harm, intimidate, or distress others.

E-crime: occurs when a computer or other electronic communication device (e.g. mobile phone) is used to commit an offence, is targeted in an offence, or acts as a storage device for evidence of an offence.

Informed Consent: A legally sound and clear process where families are given all necessary information about how and why their child's images or videos will be taken, used, and stored. This includes details on the specific purposes, a clear understanding of potential risks, and the explicit right to withdraw consent at any time. The consent must be freely given and documented in writing, and the service must also respect a child's right to refuse consent even if a parent has provided it.

Roles and Responsibilities

Approved Provider	• Ensure all obligations under the Education and Care Services National Law and National Regulations are met, with a specific focus on digital safety and child protection in online environments. • Mandate that the Safe Use of Digital Technologies and Online Environments policy and procedures are fully implemented, that appropriate and regular risk assessments are completed, and that all identified actions are taken promptly to minimise any risks to children's health, safety, and wellbeing in digital spaces. • Actively promote and embed a culture of child safety and wellbeing that underpins all aspects of the service's operations, including online learning environments and digital interactions, specifically to reduce all forms of risk to children (including the risk of abuse, exploitation, and inappropriate exposure). • Ensure the safe, supervised, and purposeful use of all digital technologies, including smart toys and online environments, across the entire service. • Liaise with the School to understand the location of any CCTV cameras within the OSHC environment. • Liaise with the School to ensure all CCTV images and recordings within OSHC areas are stored securely and handled with highest level of confidentiality. • Ensure Nominated Supervisors, Educators, and other staff rigorously implement practices that align with the National Model Code and the service's explicit child safe practices for the ethical and secure use of electronic and digital devices for taking, storing, and sharing images or videos of children. • Ensure all policies and procedures actively promote equity and respect diversity for the safety and wellbeing of all children and young people in digital contexts. • Take all reasonable and necessary steps to ensure that Nominated Supervisors, Educators, and other staff consistently follow the Safe Use of Digital Technologies and Online Environments policy and procedures, with regular monitoring and accountability. • Ensure that current copies of the policy and procedures are readily accessible to all stakeholders (children, families, staff, volunteers) and are available for inspection, promoting transparency in our safety practices.
Nominated Supervisor and Responsible Person	• Rigorously implement the Safe Use of Digital Technologies and Online Environments policy and procedures and ensure that dynamic, up-to-date

	risk assessments are consistently in place for all digital activities. Action plans for individual children will be developed and implemented where necessary to address specific online safety needs. • Ensure all staff are comprehensively trained and understand how to actively and vigilantly supervise children while they are using digital technologies, including monitoring screen content and interactions. • Ensure staff-to-child ratios are consistently met and maintained to ensure adequate and effective supervision of children engaging with digital technologies. • Ensure all educators and staff know precisely where to access and fully understand the Safe Use of Digital Technologies and Online Environments policy and procedures. • Maintain ongoing, transparent communication with educators and staff about their responsibilities and any changes to policies, procedures, and relevant legislation, particularly as digital technologies and online risks evolve rapidly. • Actively support educators and staff to uphold the service's robust culture of child safety and wellbeing across all operations, including when accessing digital technologies and online learning environments. • Support educators and staff to fully understand the National Model Code and effectively manage the use of electronic and digital devices at the service, including the service's explicit expectations around the appropriate and prohibited use of personal and service-issued devices. This includes training on how to handle situations where a child, regardless of parental consent, expresses a wish not to be photographed or filmed. • When required, work collaboratively with appropriate external services and/or professionals (e.g., eSafety Commissioner, child protection agencies) to support children's safe access, inclusion, and participation in the program, including their secure engagement in online learning environments. • Ensure families have provided authorisation for their child to access digital technology at the Service
All Staff	• Implement the Safe use of digital technologies and online environments policy and procedures and ensure that any action plans developed for individual children are implemented. • Consistently uphold the service's culture of child safety and wellbeing in all interactions, with particular vigilance when accessing digital technologies and online learning environments. • Understand the individual needs and action plans for specific children and understand how they relate to the safe and appropriate use of digital technologies and online environments for those children. • Ensure active constant, and vigilant supervision of children when they are using digital technologies, including by monitoring screen content, interactions, and maintaining strict staff-to-child ratios. • Recognise and respond effectively to children and young people when discussing the use of digital technologies and online environments, considering their diverse needs, interests, and developmental stages, and empowering them to report concerns. • Actively ensure children and young people participate in decision-making in matters affecting them regarding the safe and appropriate use of digital technologies and online environments at the service, fostering their digital literacy and agency. • Ensure you fully understand the National Model Code and the service's explicit expectations around the use of personal and service-issued devices while at the service and proactively seek guidance when needed from the Nominated Supervisor or Approved Provider regarding any digital safety concerns or uncertainties, including respecting a child's right to

	refuse to have their image taken or shared, even if prior parental consent has been provided . Report any concerns regarding the CCTV surveillance and monitoring system's functionality, placement, or misuse to the Nominated Supervisor immediately.
Families	- Read, understand and adhere to the Service's policies and procedures regarding the Safe use of digital technologies and online environments for children. - Provide written authorisation for their child's use of digital technology at the Service and for their child to use their own personal device, when brought to the Service. - Raise any questions or concerns about the CCTV system with the Nominated Supervisor. - Actively support and reinforce the Service's expectations regarding the use of children's personal digital devices while at the Service, understanding these are in place for the safety of all children. - Promptly raise any concerns about the safe use of personal devices and/or the internet with the Nominated Supervisor, collaborating to address potential risks.

Key Tasks and Responsibilities

Managing Infrastructure	The Approved Provider is responsible for ensuring the service has robust and up-to-date technological protections established, where children may access the internet as part of the program. The Nominated Supervisor or Responsible Person is responsible for ensuring these safeguards are consistently working as intended and are regularly reviewed for effectiveness.
Providing Supervision	All educators, especially those tasked with leading specific activities, are responsible for actively and vigilantly supervising children using devices and accessing content, ensuring their safety and appropriate engagement at all times.
Professional Communication Interactions	All educators are expected to behave in the manner set out in policy to ensure children's safety and wellbeing is never compromised in any form of communication, particularly online. Any concerns are to be immediately brought to the attention of the Nominated Supervisor to be addressed promptly and effectively.

Procedures

Cyber Safety

Cyber Safety encompasses the comprehensive protection of users of technologies that access the Internet, and is relevant to all digital devices including computers, iPads and tablet computers, mobile and smart phones and any other wireless technology (including personal wearable devices like smart watches). With increasingly sophisticated and affordable communication technologies, there is a critical need for children and young people to be informed of both the benefits and the inherent risks of using such technologies. More importantly, robust safeguards must be in place to protect young children from accidentally stumbling upon, being exposed to, or being targeted by unsuitable material, content, or individuals.

The Service has a duty of care to children under various legislative frameworks to ensure the environment is consistently safe, inclusive, respectful and free from risk of harm, including all forms of cyber bullying behaviour. Educators will respond appropriately to any suspected or reported cyberbullying by reporting this behaviour immediately to management who will then assess the need to seek further advice from the Police or the eSafety Commissioner.

The Service will ensure all digital devices that have the ability to access the internet have appropriate and regularly updated filtering and monitoring systems and protocols enabled to protect children from inappropriate content and interactions.

Educators will actively encourage children's safe and responsible use of the internet through a range of proactive strategies including, but not limited to:

- Vigilantly monitoring what children are looking at/for when accessing the internet, ensuring content is age-appropriate and safe,
- Actively monitoring who children are chatting to/interacting with while accessing the internet, ensuring all interactions are safe and authorised,
- Engaging in regular, age-appropriate conversations with children about their concept of 'the internet' and 'being online,' intentionally teaching them about safe online behaviours, privacy, and how to report anything that makes them feel uncomfortable or unsafe. This includes empowering children to understand and exercise their right to have an image or video of them removed or not taken at all.

Digital Technology and Electronic Devices used at the Service

Visitors, volunteers and family members will be informed that the use of personal electronic devices used to take photos, record audio or capture video of children who are being educated and cared for at the Service is strictly prohibited. This includes the use of items such as tablets, iPads, mobile phones, digital cameras, smart watches, META sunglasses and personal storage and file transfer media (such as SD cards, USB drives, hard drives and cloud storage).

Explicit written consent will be required from parents/guardians before any visitor or volunteer captures images or videos of a child. This includes, but is not limited to, incursion providers, practicum students, Inclusion Support professionals, or NDIS funded support professionals. This consent is necessary for any image or video captured for professional observation or documentation purposes.

Service Owned Device use

The Service will ensure an adequate supply of digital devices are provided for Educators to use for work related purposes. This may involve taking images, videos or recording audio of children as part of their professional duties.

Service owned devices may also store records with children and families personal information and contact details. These devices will be password protected with access limited to authorised persons only.

Where service owned devices and media are made available to children, these are to only contain content that is appropriate for children, using government classifications (G and/or PG-rated) as the guiding principle and regularly reviewed for suitability.

Children's access to digital technology and devices

Any children using devices – connected to the internet or not - must be properly and actively supervised in an open and visible environment. Educators must be able to easily view screens at any moment to ensure appropriate content and interactions. Any access to the internet must be approved and is only made available when filtering and/or monitoring systems are enabled and only then for supervised homework or pre-approved research purposes.

To ensure a safe online environment, the Service will ensure there are appropriate and regularly updated filtering and monitoring systems and controls in place for all situations where children may have access to the internet, online learning platforms or other applications,.

Educators will provide adequate, diligent and consistent supervision to monitor children's access to the internet, online learning platforms and applications to ensure only appropriate and safe content is being accessed and interactions are secure.

Children with opportunity to access personal devices will only be done so with the express written permission of their parent/guardian and only where the appropriate filtering and monitoring systems are confirmed to be in place on the device itself, and under direct supervision.

Children's personal devices will NOT have access for connection through the Service's internet provider to maintain a secure network.

Educators will not encourage or permit children to take photos or videos of other children on their own personal devices under any circumstances, to protect privacy and prevent misuse. Additionally, children will be educated on the ethical use of service-owned devices for taking images, with a strict protocols for taking photos or videos of other children and only for an educator-led, pre-approved project with explicit consent from all involved.

Should a child be accessing inappropriate content or using the camera on their device without permission, immediate action will be taken to stop the activity, and written notification will be provided to parents/guardians advising them of the incident and the safety breach. The letter may also outline future restrictions to be imposed on the ability to have their personal device at the Service at any time with the primary goal of ensuring the safety of all children.

Any intentional misuse of a personal device for the purpose of online bullying, harassment or image-based abuse will be immediately and thoroughly investigated and reported to relevant child protection authorities such as the Office of the eSafety Commissioner, in accordance with policy [2.14 Child Protection and Mandatory Reporting](#)

Educators Device use

To further align with the National Model Code's emphasis on minimising privacy risks, Educators will be strictly prohibited from having their own personal digital devices on their person while at the Service. The only exception is if they have explicit written permission from the Approved Provider for specific, pre-approved operational reasons such as emergency contact or a medical issue.

The Approved Provider will inform staff, educators and visitors of exemptions or prescribed circumstances that may warrant a person to use or be in possession of a personal electronic device that can be used to take images or videos. Staff, educators or visitors with an exemption must not use the personal device to take images or videos while working directly with children. Exemptions must be authorised in writing by the Approved Provider and may include:

- Emergency communication during incidents such as a lost child, injury, lockdown, or evacuation
- Personal health needs requiring device use (e.g. heart or blood sugar monitoring)
- Disability related communication needs
- Urgent family matters (e.g. critically ill or dying family member)
- Local emergency event to receive alerts (e.g. government bushfire or evacuation notifications)

Taking of Images and Videos of Children

Educators are strictly prohibited from using their personal devices to take images or videos of children at the service. All photos and/or videos taken must be done on service-owned, secure devices and will only be for educational or documented learning purposes, refer policy [1.2 Documenting Children's Learning](#).

Safe Storage of Images and Videos of Children

All digital images and videos will be stored on encrypted, service-owned storage devices or cloud services. Access will be managed through multi-factor authentication where possible. Personal devices, including staff phones or personal cloud accounts, are strictly prohibited for storage.

The Nominated Supervisor will be responsible for conducting quarterly audits of all digital storage systems to ensure compliance with this policy. This includes verifying that images are being stored correctly, that access to images and videos is authorised and that all data related to departed children has been properly deleted, where relevant.

Data Transfer and Secure Disposal

To prevent data loss and unauthorised access, all images and videos captured on service owned devices must be securely transferred to the primary storage system on a regular basis. Once transferred, the images must be immediately and permanently deleted from the specific device's local storage to prevent any data loss or unauthorised access.

When a child leaves the service, all digital images and videos related to that child will be permanently deleted from all storage locations within a defined timeframe (e.g., 30 days post-enrolment end), or in accordance with regulatory prescribed documentation retention periods. A formal log will be maintained to record the date and method of disposal. For printed materials, secure shredding or incineration will be used.

Software Programs, APPS and Artificial Intelligence (AI) Interactions

The Service uses an online documentation software program that enables the sharing of observations, photos, videos, daily reports, and learning portfolios with families through a secure, closed platform. Access is password protected to ensure the privacy of children, families, and Educators. Each parent account holder is required to create their own user account and ensure log in, and password information is not shared.

The Approved Provider will ensure programs requiring additional background checks, such as CCS Software, are only accessed by authorised staff who have completed necessary screening processes in accordance with Family Assistance Law.

The Nominated Supervisor will ensure any educational software programs or APPS used as part of the program are age-appropriate and that service owned devices used have appropriate and regularly updated filtering and monitoring systems and controls in place.

When accessing or using AI, Educators must be aware of its limitations, privacy risks, and the potential for errors. AI can be a useful tool but is the responsibility of the user to ensure the accuracy of the information it provides. No details that could identify individual children, such as names and date of birth should ever be used with AI. Refer policy [1.8 Use of Artificial Intelligence \(AI\) Technology](#)

Closed Circuit Television (CCTV) Surveillance and Monitoring Devices within the OSHC Environment

Installation, Location and Maintenance

Education Queensland have the responsibility for ensuring that CCTV surveillance and monitoring systems installed on school grounds are compliant with relevant Commonwealth, State and Local Government laws and regulations at all times and are responsible for maintenance of cameras and devices.

Communication of CCTV Presence

The Approved Provider will collaborate with the School to ensure that reasonable steps are taken to notify all persons entering school grounds about the use of CCTV cameras.

Retention, Storage and Use of CCTV Data

CCTV surveillance and monitoring systems record continuously 24 hours a day for a period of 6 weeks with all recordings securely stored within the School's data network storage.

Access to any CCTV recordings will be in accordance with Education Queensland Policy.

Confidentiality and Privacy

Policy [7.6 Privacy and Confidentiality of Records](#) applies to all use of digital technology and online environments. All staff and visitors must ensure that any information, images, or digital content related to children, families, and the Service is collected, stored, used, and shared in accordance with privacy legislation and Service procedures, to maintain confidentiality and protect the safety and wellbeing of children.

The Nominated Supervisor will immediately advise the Approved Provider of any potential threats to data security and will follow all relevant policies, procedures and practices to protect sensitive digital data.

If there is any suspicion that an e-crime has been committed, a report will be made to the police. If there is a reasonable suspicion that evidence of a crime is contained on a service issued or Educator's device it will

be made available to the investigating police officer without delay and the electronic device should not be tampered with.

The Service may also be required to complete *an Incident, Injury, Trauma and Illness report* and notify the Regulatory Authority as per policy [7.7 Managing Notifications](#), ensuring all legal and ethical reporting requirements for child safety are met.

The Approved Provider will notify the Office of the Australian Information Commissioner (OAIC) in the event of a possible data breach. This could include:

- A device containing personal information about children and/or families is lost or stolen (parent names and phone numbers, dates of birth, allergies, parent phone numbers,
- A data base with personal information about children and/or families is hacked,
- Personal information about a child is mistakenly given to the wrong person (portfolios, child developmental report),
- Any possible breach within the Service or if the device is left behind whilst on an excursion.

Identification of Online Abuse and Reporting Safety concerns

Through comprehensive induction and ongoing training, Educators and other staff will be made aware of their mandatory reporting requirements to report any concerns related to child safety including inappropriate use of digital technology to the Nominated Supervisor or Approved Provider.

Educators will actively encourage children's safe and responsible use of digital technology and devices through a range of proactive strategies including, but not limited to:

- Monitoring what children are looking at/for when accessing the internet, ensuring content is age-appropriate and safe,
- Engaging in regular, age-appropriate conversations with children about their concept of 'the internet' and 'being online,' intentionally teaching them about safe online behaviours, privacy, and how to report anything that makes them feel uncomfortable or unsafe.
- Empowering children to understand and exercise their right to have an image or video of them removed or not taken at all

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.162A Child Protection Training
 - S.162B Child Safety Training
 - s.165 Offence to inadequately supervise children
 - S.166A Offences relating to inappropriate conduct
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.73 Educational Program
 - R.76 Information about educational program to be given to parents
 - R.84 Awareness of child protection law
 - R.128B Child protection training
 - R.128D Foundation child safety training
 - R.128E Advanced child safety training
 - R.115 Premises designed to facilitate supervision
 - R.155 Interactions with children
 - R.156 Relationships in groups
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.172 Notification of change to policies or procedures
 - R.175 Prescribed information to be notified to Regulatory Authority

- R.176 Time to notify certain information to Regulatory Authority
- R.181 Confidentiality of records kept by approved provider
- R.183 Storage of records and other documents
- R.184 Storage of records after service approval transferred
- R.195 Application of Commonwealth Privacy Act 1988
- **National Quality Standard:**
 - QA 1 – Educational Program and Practice
 - QA2 – Children’s health and safety
 - QA3 – Physical Environments
 - QA4 – Staffing arrangements
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Criminal Code Act 1899 \(Qld\)](#)
- [Online Safety Act 2021 \(Cth\)](#)
- eSafety Commissioner - [Best Practice Framework for Online Safety Education](#)
- eSafety Commissioner - [eSafety Early Years program for educators](#)
- ACECQA [PolicyGuidelines SafeUseOfDigitalTechOnline final.pdf](#)
- [NQF Online Safety Guide 1.pdf](#)
- [NQF Child Safe Culture Guide | ACECQA](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)
- [National Model Code Taking Images and Videos.pdf](#)
- [Privacy Act 1988 \(Cth\)](#)

Related Policies and Procedures

- [1.1 Educational Program Development and Implementation](#)
- [1.8 Use of Artificial Intelligence \(AI\) Technology](#)
- [2.1 Providing a Child Safe Environment](#)
- [2.2 Supervision and Educator Ratios](#)
- [2.14 Child Protection and Mandatory Reporting](#)
- [2.17 Child Safety and Wellbeing](#)
- [4.6 Code of Conduct](#)
- [5.1 Interactions and Relationships with Children](#)
- [6.2 Enrolment and Orientation](#)
- [7.5 Governance and Management](#)
- [7.6 Privacy and Confidentiality of Records](#)
- [7.7 Managing Notifications](#)

Forms and Resources

- [Digital Technology/Online Environment Authorisation Form](#)
- [Service Owned Digital Device Register](#)
- [Parent/Guardian Consent for Taking, Use and Storage of Images and Videos](#)
- [CCTV Parental Acknowledgement Form](#)

Policy 2.16 Safe Use of Digital Technologies and Online Environments		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Address regulatory changes		
V1-06.2024 – No updates		
V2-03.2025 – Added additional definitions to policy statement, additional procedures relevant to cyber safety, additional information to Infrastructure and Technology, social media and communication and information sharing with families.		
V3-10.2025 – Policy renamed from Safe Online Environments for Children, additional definitions, enhanced policy statement, added roles and responsibilities, enhanced key tasks and responsibilities, enhanced procedures relevant to cyber safety, amended procedures relevant to infrastructure and technology, additional procedures relevant to service owned and educator device use, additional procedures relevant to taking of images and videos of children, safe storage of images and videos of children, software programs, Apps and AI interactions, CCTV surveillance and monitoring devices confidentiality and privacy, identification of online abuse and reporting safety concerns, additional regulatory context and guidance to align with child safe standards		
V4-04.2026 – added procedures relevant to authorisation of personal device use and exemption criteria		

2.17 Child Safety and Wellbeing

Policy Statement

The Service recognises that every child has the right to feel safe, be safe and have their voices heard. Children are placed at the centre of all decision making, with their views actively guiding service delivery, planning and review. This policy reflects our deep commitment to promoting the safety, wellbeing, and rights of all children, embedding child safety into every aspect of our operations from governance and leadership to daily practice.

The Service is dedicated to creating environments where every child's identity is protected and respected, with a strong focus on cultural safety, particularly for Aboriginal and Torres Strait Islander children. We recognise families and communities as essential partners in safeguarding children. Their knowledge, lived experience, and cultural perspectives are actively integrated into service design and continuous improvement. Through genuine collaboration and transparent communication, we ensure that child safety practices are culturally responsive, inclusive, and community informed.

The Service is fully committed to embedding Child Safe Standards that guide our practice, culture, and decision-making. Governance and leadership foster a culture where child safety is visible, prioritised, and continuously strengthened, supported by clear accountability structures and dedicated resourcing. Children's voices are central to our approach, with participation encouraged through age-appropriate forums, safety planning, and feedback mechanisms.

Our preventative systems to safeguard children are comprehensive, proactive, and embedded across all levels of the service. Child-safe recruitment and screening processes are supported by structured induction and suitability declarations to ensure ongoing workforce suitability. Prior to any unsupervised contact with children, all employees and volunteers must sign the Service's Codes of Conduct and are actively engaged in ongoing professional learning, focused on legislative obligations, trauma-informed practice, and emerging risks.

Child safety education and reporting information is made visible to educators across learning environments and online platforms. All staff and educators are trained and supported to respond to child safety concerns promptly, professionally, and in accordance with clearly defined reporting and management procedures.

All records including, incident reports, and investigation outcomes are securely stored in password protected files with access restricted to authorised personnel, with retention aligned to the relevant legislative requirements.

A culture of continuous improvement and accountability underpins this policy. Child safe practices and systems are regularly evaluated through internal spot-checks, annual reviews, and external audits to ensure they remain effective, responsive, and aligned with evolving standards and the diverse needs of children. Investigation findings are reported to the Approved Provider to inform strategic decisions, policy refinement, and resource allocation. Through ongoing reflection and review, we strengthen our practices and uphold our responsibility to create safe, inclusive environments where every child's wellbeing is protected and respected.

Roles and Responsibilities

Approved Provider	• Allocate resources for child protection training, annual external audits and secure record-keeping systems. • Notify ACECQA via NQA-ITS of any serious incident within 24 hours. • Ensure all employees and volunteers understand and adhere to their mandatory reporting obligations. • Establish, implement, and maintain comprehensive policies, procedures, and management systems that actively promote child safety, aligned with recognised Child Safe Standards. • Ensure the service meets all legislative and regulatory requirements for child protection and safety.

	- Implement robust risk management strategies and controls to ensure systems foster a safe and protective environment for children. - Recruit, induct and continuously support, suitable educators to provide care and positive guidance, prioritising children's safety and wellbeing. - Provide educators with clear policies and instructions to identify child protection concerns and fulfill their mandatory reporting duties to Child Safety.
Nominated Supervisor	- Oversee the daily implementation of child safety controls and ensure ongoing compliance with the Service's Codes of Conduct. - Serve as the first point of contact for any concern or disclosure - Ensure that mandatory reports are lodged with Child Safety Services within 24 hours of becoming aware of the concern. - Report harm to the appropriate reporting body within the required timeframe. - Provide induction and annual refresher training on child protection requirements and cultural safety.
Educational Leader	- Integrate child-safe practices and self-advocacy lessons into all programming to empower children and promote safety. - Mentor educators and other staff in identifying, documenting and responding to indicators of harm. - Liaise with cultural advisors to ensure programs are culturally safe and respectful for Aboriginal and Torres Strait Islander children. - Embed protective behaviours into daily routines and activities to reinforce safety and resilience.
All Staff	- Hold a current Positive Notice Working With Children Check (Blue Card). - Sign and adhere to the Service's Codes of Conduct before engagement. - Observe, document and report any concerns or incidents to the Nominated Supervisor within 24 hours. - Guide and mentor volunteers and students to comply with child safe practices and mandatory reporting requirements. - Maintain professional boundaries and comply with all digital-safety protocols.
Volunteers and Students	- Participate in a comprehensive induction process and sign the Service's Codes of Conduct before engaging with any children. - Work under direct supervision of Educators. - Immediately report any suspicion or disclosure to the Nominated Supervisor.
Families	- Notify the Service of any changes in family circumstances or risk factors. - Follow the Service's complaints process for raising concerns.
Children	- Have access to age-appropriate information about their rights and how to raise concerns. - Participate in safety activities and feedback forums through the Service program - Be empowered by educators to speak up to any trusted adult.

Key Tasks and Responsibilities

Child Protection Training	The Approved Provider is responsible for ensuring that all prescribed staff have successfully completed a nationally recognised child protection training unit, to meet the requirements of Section 162A of the Law. The Approved Provider must ensure that all staff working with children are advised of the existence and application of current child protection laws and their obligations under them.
Supervising educator conduct	The Approved Provider and Nominated Supervisor hold primary responsibility for ensuring that educators, other staff and volunteers consistently meet the

	behavioural expectations outlined in this policy. They play a critical role in monitoring conduct, fostering a safe and respectful environment, and upholding the standards of child safety and wellbeing. Where concerns arise, the Nominated Supervisor is expected to promptly communicate these to the Approved Provider to ensure appropriate oversight and timely action. The Approved Provider is responsible for initiating and overseeing any necessary management responses, ensuring that concerns are addressed in a manner that prioritises the safety and dignity of children.
Observing children's wellbeing and experiences	All educators, other staff and volunteers must remain vigilant and responsive to any signs that a child may be at risk or in need of protection. This includes observing behaviours or noting circumstances that may indicate harm, neglect, or vulnerability. Where concerns arise, educators must promptly report them to the Nominated Supervisor or other designated leader to ensure that appropriate action is taken. This may involve assessing mandatory reporting obligations, initiating protective measures, or connecting the child and family with relevant supports. Timely communication and documentation are essential to safeguarding children and upholding the service's commitment to child safety and wellbeing.
Reporting concerns	All educators are responsible for identifying and reporting concerns related to a child's safety, wellbeing, or protection. While any educator may make a direct report, if necessary, concerns should typically be raised with the Nominated Supervisor to ensure appropriate documentation, assessment, and follow-up action. The Approved Provider oversees the management of serious concerns and child protection cases and ensures compliance with reporting obligations.

Procedures

Respect for Children

The service is committed to creating an inclusive, culturally safe, and rights-based environment where every child feels respected, valued, and protected. Children are provided with meaningful opportunities to express their views and offer feedback on the activities they engage in and the individuals they interact with. Their participation in decision-making processes particularly those relating to safety and wellbeing is actively supported and valued. This is achieved by recognising and responding to the unique strengths, needs, and vulnerabilities of each child, ensuring they have genuine agency within the service.

Every child's culture and identity are respected, positively acknowledged, and celebrated as integral to their sense of belonging and wellbeing, including Aboriginal and Torres Strait Islander children, children with disability, those from culturally and linguistically diverse backgrounds, children unable to live at home, and LGBTIQ+ children and young people. The service upholds policies on accessibility, anti-discrimination, cultural safety, diversity, and inclusion, and implements strategies across all levels of the service to actively counter discrimination and exclusion.

All individuals engaged by the service are required to uphold the standards outlined in the relevant Codes of Conduct, policies, regulations, and laws which defines appropriate behaviour for interactions with and around children.

Safeguarding Children

The following systems outline how the service translates its safeguarding commitment into everyday actions. They provide clear guidance for educators, staff, families, and volunteers on creating safe, inclusive, and protective environments for all children. These embedded systems ensure that safeguarding children is practiced across all areas of the service, supporting a culture where children's safety and wellbeing are consistently prioritised.

Policies and Procedures

The Approved Provider is committed to the ongoing review and improvement of all policies and procedures and in particular those that prioritise child safety and wellbeing. These policies are reviewed annually and following any significant incident or legislative change.

Children, families, staff, volunteers and members of the community are actively engaged in review processes through consultation, feedback mechanisms, and transparent communication of outcomes. Complaints, incidents, and concerns are documented, analysed for patterns or systemic gaps, and used to inform targeted improvements. All child safety documents are made available in accessible, culturally safe formats and developed in consultation with stakeholders to ensure clarity and relevance.

The Nominated Supervisor monitors staff and volunteer understanding and policy and procedure implementation through regular training, supervision, and reflective practice. The service also seeks feedback from children and families to assess awareness of and confidence in our child safe practices, ensuring our policies and procedures remain responsive, inclusive, and effective.

Recruitment

Refer policy [4.1 Recruitment and Employment of Educators](#)

All roles within the Service are advertised with a clear child-safe statement and explicit requirements for Working with Children Checks and police clearances. Recruitment is guided by a safeguarding lens, ensuring that every step prioritises child safety and suitability. Candidate screening includes two referee checks focused on prior child-related work, a social media review for conduct concerns, and verification of qualifications.

Upon engagement, all personnel complete a comprehensive induction covering legislative obligations, the Service's Codes of Conduct, trauma-informed care principles, and digital-safety protocols. This helps embed a culture of child safety from the outset, ensuring that every adult in the organisation understands their role in protecting children and upholding the values of inclusion, respect, and cultural safety.

Code of Conduct

Refer policy [4.6 Code of Conduct](#)

Prior to any unsupervised contact with children, all personnel must read and sign the Service's Code of Conduct, a foundational safeguard that sets clear expectations around professional boundaries, mandatory reporting obligations, and confidentiality. The Code of Conduct reinforces the service's commitment to child-centred, culturally safe practice and ensures that every adult understands their role in protecting children from harm.

Compliance is actively monitored to create a culture of accountability and continuous improvement. Any breaches trigger an immediate investigation, followed by a corrective action plan and, where necessary, disciplinary measures up to and including termination. This process ensures that safeguarding is not just policy but lived practice across every role and relationship.

Risk Management

Creating safe environments, both physical and digital, is a core responsibility of the Service. Risk assessment and management processes extend to organisational activities, adult-to-child and child-to-child interactions, and specific online risks, with control measures recorded in the specific risk assessments and reviewed regularly. For every excursion or high-risk activity a comprehensive risk assessment is completed, which outlines control measures, emergency procedures, and communication protocols, and a post-activity review process evaluates the effectiveness of controls, documents incidents and near misses, and updates control measures where required.

Educators, staff and volunteers minimise risks while safeguarding children's rights to privacy, access to information, social connection and learning by applying proportionate controls, using supervised and age-appropriate tools, and following communication protocols that preserve dignity and autonomy. All staff and volunteers are required to use online environments as per procedures set out within the relevant policies of the service, with breaches acted on through disciplinary and reporting procedures. The Service provides clear, accessible information to children and families about physical and online safety, acceptable conduct and how to report concerns, using culturally appropriate formats and multiple channels.

Cultural safety is embedded in risk assessments, choice of digital platforms, learning materials and supervision practices to ensure that environments affirm identity and reduce harm for First Nations children and other diverse groups. Workplace health and safety responsibilities that relate to child safety are met through training, incident management, maintenance regimes and regular consultation with staff and

families. All visitors must be signed into the service, provided with information relevant to child safety and supervised according to their purpose and risk level. This integrated, child-centred approach ensures risks are actively managed, continuously monitored and addressed through a lens of cultural safety, inclusion and continuous improvement.

Complaints Management

Refer policy [6.7 Feedback and Complaints Handling](#)

The service maintains a transparent, accessible, and responsive complaints management process that prioritises the safety, wellbeing and rights of children. All children, families, and members of the community are provided with child-friendly and culturally safe information about how to raise concerns and what to expect from the process.

Educators and volunteers are provided with ongoing training to recognise and respond to disclosures of abuse, including the various ways children may communicate distress. Educators and volunteers are actively supported to uphold their responsibilities under mandatory reporting requirements and privacy laws. Complaints relating to concerning conduct, misconduct, or criminal behaviour including harm caused by another child are received, investigated, and responded to in accordance procedures set out in the Feedback and Complaints Handling Policy.

Service policies on record keeping, information sharing, and external reporting ensure compliance with legal obligations and promote accountability. All complaints, incidents, and concerns are documented and reviewed to identify trends, inform continuous improvement, and strengthen our safeguarding practices.

Communication and Engagement

Clear, accessible communication is central to a safe and inclusive environment. Key child safety information including reporting contacts is prominently displayed throughout the service environment and noted in the various handbooks and other information available to families and member of the community. During enrolment, families receive a handbook detailing relevant policies and procedures to ensure shared understanding and accountability.

Safety updates are embedded into newsletters and notices, and regular parent surveys provide opportunity for feedback on policy and practice. Children are actively engaged through age appropriate programmed activities, which empower them to ask questions, share insights, and understand their rights in ways that are meaningful and culturally safe. This approach ensures that safeguarding is visible, participatory, and responsive in building trust with children, families, and educators.

Ongoing Learning and Reflective practice

Safeguarding is strengthened through continuous learning with initial induction training reinforced with ongoing training that addresses emerging risks such as online grooming, cultural safety, and recognising subtle signs of abuse. Ongoing training sessions are designed to keep child safety front-of-mind and responsive to current threats.

Annual refreshers include participation in training that deepens understanding of child protection and child safe practices and trauma-informed response strategies. Following any incident, facilitated debrief sessions support reflective practice, allowing staff to identify improvements and ensure that lessons learned inform future training content. This cycle of learning and reflection helps embed a culture of vigilance, accountability, and continuous improvement ensuring that safeguarding practices are adaptive and responsive to the emerging needs of children and families.

Reporting and Response

Refer policy [2.14 Child Protection and Mandatory Reporting](#)

All educators and volunteers are required to understand and comply with mandatory reporting requirements concerning the reporting of actual or suspected child abuse, neglect, exploitation and family violence.

Where concerns about a child's wellbeing do not meet the threshold for mandatory reporting, educators should still document and raise them with the Nominated Supervisor. The service will assess whether the child and family may benefit from additional support, guided by the principle of whether the parent is willing

and able to protect and care for the child. Where appropriate, the service may refer families to external support services which can provide early intervention, parenting support, and connection to community resources. The service takes a culturally responsive approach, particularly when working with Aboriginal and Torres Strait Islander children and families, ensuring that any action is respectful, strengths-based, culturally safe, and focused on strengthening the child's environment.

Queensland's Reportable Conduct Scheme will require the Approved Provider to identify, respond to, and report allegations of child related misconduct involving staff, volunteers, or contractors. This includes conduct that may occur inside or outside the workplace and applies even if the behaviour does not result in criminal charges. Educators and other staff must notify the Approved Provider as soon as they are aware of the situation and the Approved Provider must notify the relevant Regulatory Authority within 3 business days, whether or not there is proof of allegations.

Serious online abuse, illegal and restricted online content that includes cyberbullying, adult cyber abuse, image based abuse, illegal and restricted online content, online grooming or digital harm should be reported to the eSafety Commissioner within 24hrs.

Record-keeping and Privacy

Robust recordkeeping is essential to maintaining accountability and transparency in child safety practice. All recruitment and suitability documents, incident reports, and risk management documents are stored in secure password protected systems, with access restricted to authorised personnel only. Data retention meets requirements under the various legislative frameworks and regular audits verify that records are complete, accurate, and securely maintained.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.162A Child Protection Training
 - c.162B Child Safety Training
 - s.165 Offence to inadequately supervise children
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.84 Awareness of child protection law
 - R.85 Incident, injury, trauma and illness policies and procedure
 - R.86 Notification to parents of incident, injury, trauma and illness
 - R.128B Child protection training
 - R.128D Foundation child safety training
 - R.128E Advanced child safety training
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.174A Prescribed information to accompany notice
 - R.175 Prescribed information to be notified to Regulatory Authority
 - R.176 Time to notify certain information to Regulatory Authority
 - R.181 Confidentiality of records kept by approved provider
 - R.183 Storage of records and other documents
 - R.195 Application of Commonwealth Privacy Act 1988
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA4 – Staffing arrangements
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and Leadership

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Criminal Code Act 1899 \(Qld\)](#)
- [Online Safety Act 2021 \(Cth\)](#)
- eSafety Commissioner - [Best Practice Framework for Online Safety Education](#)
- eSafety Commissioner - [eSafety Early Years program for educators](#)
- Queensland Government [Statement of Shared Commitment](#)
- [NQF Online Safety Guide 1.pdf](#)
- [NQF Child Safe Culture Guide | ACECQA](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)
- [Privacy Act 1988 \(Cth\)](#)
- [Child Safe Organisations Bill 2024](#)
- [Child Safe Regulations 2025 \(Qld\)](#)
- [Information Privacy Act 2009 \(Qld\)](#)

Related Policies and Procedures

- [2.1 Providing a Child Safe Environment](#)
- [2.2 Supervision and Educator Ratios](#)
- [2.4 Incident, Injury, Trauma and Illness](#)
- [2.14 Child Protection and Mandatory Reporting](#)
- [2.16 Safe Use of Digital Technologies and Online Environments](#)
- [4.1 Recruitment and Employment of Educators](#)
- [4.3 Working with Children Checks and Management](#)
- [4.5 Volunteers and Students](#)
- [4.6 Code of Conduct](#)
- [5.1 Interactions and Relationships with Children](#)
- [5.5 Promoting Protective Behaviours](#)
- [6.5 Interactions and Communication with Families](#)
- [6.7 Feedback and Complaints Handling](#)
- [6.11 Cultural Safety](#)
- [7.1 Nominated Supervisor](#)
- [7.4 Leading Compliance and Quality Assurance](#)
- [7.5 Governance and Management](#)
- [7.6 Privacy and Confidentiality of Records](#)
- [7.7 Managing Notifications](#)
- [7.12 Workplace Health and Safety](#)

Policy 2.17 Child Safety and Wellbeing		
Version and reason for change	Date Implemented	Date of Review
V1-10.2025 – New policy to align with child safe standards		
V1-04.2026 – No updates		

Policy Group 3

Physical Environment

The services physical environment is **safe, suitable and provides a rich and diverse range of experiences** which promote children's learning and development.

Ensuring the physical environment suitable for play-based learning is critical to:

- contributing to children's wellbeing, creativity and developing independence
- engage children and support educators to facilitate a wide range of experiences
- keeping children safe
- creating/organising spaces to reduce the risk of injury.

The policies contained in this group set out the service's expectations for the physical environment and how educators can use practices to enhance it for children's learning and safety.

3.1 Space and Facilities Requirements

Policy Statement

The Service will ensure the space and facilities used for the OSHC program are actively monitored and maintained to meet the highest standards of safety, cleanliness, and repair, are stimulating and enable the provision of quality education and care. The Service will work collaboratively with all stakeholders to ensure the environment is inclusive and positively contributes to children's safety, wellbeing and development.

The Service recognises its fundamental responsibility to ensure the environment and equipment used in providing education and care is consistently safe, clean and in good repair, with a proactive approach to identifying and mitigating potential risks to children.

Roles and Responsibilities

Approved Provider	• To establish the arrangement of space and facilities with the school that are sufficient and suitable for providing a child-safe, stimulating, and quality education and care environment. • Ensure the space and facilities used in providing education and care is consistent with Regulations and align with the facilities and environment requirements of the Child Safe Standards. • Ensure adequate resources are allocated for the maintenance, repair, and ongoing improvement of facilities to uphold child safety and wellbeing.
Nominated Supervisor	• Monitor and respond to any issues relating to the repair, hygiene and safety of the facilities and the environment, prioritising any risks to child safety. • Collaborate with the Approved Provider, school and educators to identify opportunities for improvement, with a specific focus on enhancing child safety and developmental outcomes. • Lead the procedure for requesting, comparing and sourcing of additional, repair of or replacement facilities, ensuring all decisions prioritise child safety, accessibility, and developmental appropriateness.
All Staff	• Monitor and report instances of issues relating to the repair, hygiene and safety of the facilities and the environment, especially any potential hazards to children. • Supervise children to ensure the environment is contributing to children safety, wellbeing and development and actively promote children's participation in maintaining a safe and respectful environment as appropriate for their age and capability.

Procedures

Education and Care Facilities

The Service will ensure the areas provided for education and care are reflective of the agreed indoor and outdoor spaces identified in the Service Approval and routinely monitored for comfort and safety. Educators and the Nominated Supervisor will address any immediate issues with urgency to ensure children's safety and wellbeing.

The Approved Provider and Nominated Supervisor will ensure the space and facilities for the Service includes:

- Readily available and adequate toileting and handwashing facilities for children and educators, designed to promote independence and privacy, and regularly cleaned and sanitised to prevent the spread of illness,
- Available and adequate facilities to cater for soiled clothing including hygienic storage, ensuring dignity and hygiene for children.

- Sufficient furniture allowing the environment to be organised in a manner that is developmentally appropriate for all children, including the capacity to be inclusive and adaptable to ensure participation by every child in the program, recognising and responding to the diverse needs of all children.
- Areas for the display of children's artwork as well as promotion of notices and communication for families, fostering a sense of belonging and open communication.
- Adequate space for children to engage in rest and/or quiet experiences, supporting their emotional and physical wellbeing.

Indoor spaces will be monitored for adequate ventilation, natural light and temperature that ensures the safety and wellbeing of children. Air conditioners will be set at a reasonable temperature at all times it is in use with the recommendation being 24 °c to maximise energy efficiency.

Educators will ensure that, before the air conditioning is turned on, windows and doors will be closed for energy efficiency.

Regular maintenance shall be carried out on the system/s by a reputable contractor where a service report shall be required. Regular cleaning of the air conditioner unit dust filters will be conducted and included as part of the Service cleaning schedule.

Fire Safety

The Service will ensure the environment supports the protection of children from fire by:

- Keeping emergency exits clear and unlocked at all times while the service is operating with clear and unobstructed pathways for immediate evacuation.
- Ensuring emergency evacuation signs and posters are displayed, including emergency evacuation floor plans displayed at each exit that are clearly visible and understandable to all children and staff.
- Ensuring all relevant fire safety equipment is maintained regularly (refer policy [3.5 Emergency and Safety Equipment](#)) and staff are trained in its proper use and emergency procedures.

Administration Facilities

The Service will ensure adequate administrative space and facilities are available for the purposes of:

- Conducting the administrative functions of the service.
- Private and personal conversations with families, respecting confidentiality and promoting open communication about children's wellbeing.
- Providing rest area for staff and/or volunteers.
- A telephone being accessible at all times for emergency and communication needs.
- Suitable storage space for valuable and personal items
- Adequate lockable storage facilities for equipment, tools, first aid kit, medication and relevant hazardous substances to prevent unauthorised access by children and ensure their safety.
- Lockable cupboard or filing cabinet for all child and family information (including enrolment forms), educator records and any other confidential records, maintaining privacy and protecting sensitive information in line with child safe practices.

Outdoor and toileting Facilities

The Service will ensure the risk of harm to children through the natural environment is minimised by accessing information from the Queensland Government Resource: [Plants and mushrooms | Queensland Poisons Information Centre \(health.qld.gov.au\)](#) and proactively removing any identified hazardous plants or materials.

The Service will ensure playground equipment, swings and other large pieces of equipment located within the service's approved outdoor play areas is located over areas with soft fall surfaces recommended by recognised safety authorities and regularly inspected for wear, tear, and safety compliance.

The Service will ensure that adequate and safe drinking water is provided and accessible to children at all times they are in attendance at the Service, promoting healthy hydration and preventing dehydration, especially during outdoor play.

Shared Space Arrangements

The Service use of shared space will be clearly articulated within the OSHC service agreement between the school and the Approved Provider and will include information surrounding:

- Communication between the school and the Service in regard to shared arrangements,
- The storage and packing arrangements for equipment and materials used in the shared space, ensuring items are stored securely and out of reach of children when not in use.
- The accessible entries and exits to the shared space by the Service including emergency exits and clear procedures for their use in emergencies,
- Evacuation and lockdown procedures for shared facilities, ensuring these procedures are regularly reviewed to ensure effectiveness.
- The accessible amenities to be used by the Service and those available to the public, with clear distinctions and supervision protocols to ensure children's safety.
- Telephone access whilst using the shared space for communication in emergencies or for immediate needs,
- Cleaning and maintenance requirements, with clear responsibilities for maintaining a clean and safe environment for children.
- Security and closing procedures for the shared space detailing service and public responsibilities and specific measures to prevent unauthorised access and ensure children's safety at all times; and
- Communication strategies for external users of the shared facility to ensure a shared understanding of child safety expectations.

Maintenance of Facilities

Management and educators have a responsibility and duty of care to ensure the building, furniture, grounds, and equipment are safe and hygienic. We aim to ensure that all furniture and equipment at the OSHC Service adheres to recognised safety standards and is age appropriate for the children and regularly inspected for safety and suitability.

The Approved Provider will ensure the establishment of an effective reporting of facilities maintenance processes and schedule including but not limited to:

- Day to day maintenance of the facility with a proactive approach to identifying and addressing minor issues before they become significant risks,
- Replacement of play equipment, ensuring all new equipment meets safety standards and is appropriate for the age and developmental stage of the children,
- Replacement of major items such as fridges and televisions
- Repairs, with prompt attention to any repairs that impact child safety or wellbeing.
- Refurbishment, with consideration for child safety and accessibility throughout the design and implementation process.

The Service will immediately notify the School Principal of all damaged property or equipment, recording it in a maintenance log and removing it from children's access if it poses a safety risk.

Daily/weekly routine visual inspections will be made of all playground equipment to identify obvious hazards in surfacing, fixed and mobile equipment, moving parts, swings, ropes, chains, tyres, fences and/or sandpits. Records are kept of inspections and maintenance of furniture, playgrounds and equipment.

School property or equipment damaged due to the activities undertaken by the Service will be repaired or replaced by the Service with a commitment to ensuring the ongoing safety of the play environment.

Purchasing and Development

Educators and families will be encouraged to identify suitable opportunities to address concerns with the facilities, fostering a collaborative approach to continuous improvement in child safety and wellbeing.

The QIP will also identify opportunities to enhance the Service's provisions and utilisation of their spaces, with a specific focus on aligning with the Child Safe Standards to create the safest and most supportive environment for children.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations:**
 - R.82 Environment to be free from tobacco, vaping devices, vaping substances, drugs and alcohol
 - R.84A Sleep and rest
 - R.103 Premises, furniture and equipment to be safe, clean and in good repair
 - R.105 Furniture, materials and equipment
 - R.106 Laundry and hygiene facilities
 - R.107 Space requirements—indoor space
 - R.108 Space requirements—outdoor space
 - R.109 Toilet and hygiene facilities
 - R.110 Ventilation and natural light
 - R.111 Administrative space
 - R.113 Outdoor space—natural environment
 - R.114 Outdoor space—shade
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety
 - QA3 – Physical environment
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)
- [National Principles | Child Safe Organisations](#)

Related Policies and Procedures

[1.1 Educational Program Development and Implementation](#)

[1.5 Sleep, Rest and Relaxation](#)

[2.1 Providing a Child Safe Environment](#)

[2.5 Administration of First Aid](#)

[3.2 Authority to Occupy Premises](#)

[3.5 Emergency and Safety Equipment](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.5 Governance and Management](#)

[7.12 Workplace Health and Safety](#)

[7.13 Service Closure](#)

Policy 3.1 Space and Facilities Requirements		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V1-03.2025 – No updates		
V2-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – removed duplicated information		

3.2 Authority to Occupy Premises

Policy Statement

The Approved Provider must hold permission to occupy a premises for the purpose of conducting a centre based OSHC service, approved under the Education and Care Services National Law Act (2010) and Regulation (2011).

The permission to occupy the premises will be outlined in the documented Occupancy Agreement.

Roles and Responsibilities

Approved Provider	• Coordinate the development and finalisation of the agreement between the service and the school administration. • Facilitate review of agreement as required. • Ensure the Service complies at all times with the specific conditions of the approval applicable to the Service. • Ensure the approval is renewed and kept current in accordance with the legislation. • The relevant current service approval is kept on display at the Service whenever childcare is being provided.
Nominated Supervisor	• Follow agreed arrangement and communicate issues to the Approved Provider

Procedures

The Approved Provider has been granted authority to occupy the premises by the Principal of the School and will maintain an occupancy agreement with the school for the continuation of the service approval.

The occupancy agreement shall be reviewed regularly to ensure the obligations of both parties are being appropriately met and that the agreement is current and valid.

All communication regarding the authority to occupy the OSHC facilities will be managed by the Approved Provider.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations:**
 - R.103 Premises, furniture and equipment to be safe, clean and in good repair
 - R.107 Space requirements—indoor space
 - R.108 Space requirements—outdoor space
 - R.109 Toilet and hygiene facilities
 - R.110 Ventilation and natural light
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA3 – Physical environment
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)

Related Policies and Procedures

[3.1 Space and Facilities Requirements](#)

[7.4 Leading Compliance and Quality Assurance](#)

Policy 3.2 Authority to Occupy Premises		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V1-03.2025 – No updates		
V2-10.2025 – Enhanced roles and responsibilities		
V2-04.2026 – No updates		

3.3 Smoking, Drugs and Alcohol-free Environment

Policy Statement

The Education and Care Services National regulations state the Approved Provider must ensure the environment is free from the use of tobacco, vaping devices and substances, illicit drugs and alcohol.

The Approved Provider recognises their responsibilities in relation to ensuring all children cared for as part of the Service, have an environment that is free from tobacco, vaping substances and devices, drugs, alcohol and mind-altering substances and that employees, or volunteers at the service are not affected by alcohol or drugs (including prescription medication) to not impair their capacity to supervise or provide education and care to children attending the service.

To maintain the ongoing health and wellbeing of children, families, educators and community members, the Service actively encourages and provides a suitably healthy and safe environment where children are not exposed to tobacco, vaping substances or devices, drugs, alcohol, or any persons under the influence of tobacco, vaping substances, drugs or alcohol.

The use of or being intentionally under the influence of alcohol, drugs or mind-altering substances (recreational, prescription or over the counter) at the Service and whilst children are in care will not be tolerated. This policy reflects the service's commitment to the health and wellbeing of all persons who use or access the service.

Definitions

Alcohol: Affects both mental and motor function. Examples include beer, wine, spirits.

Under the Influence: Includes a person who has taken drugs or alcohol that interferes with sound judgement and acceptable behaviour that may impair mental and physical ability to perform their duties safely.

Drugs:

Illegal Drugs: drugs such as cannabis, amphetamines, ecstasy, cocaine and heroin, are illegal.

Prescription Drugs: Prescribed and over the counter medications can also be misused for the purposes of intoxication.

Illicit Drugs: Illicit drugs include illegal drugs, prescription medicines that have been obtained illegally or are not being used for medicinal purposes and other substances that are being used inappropriately — for example, sniffing glue or inhaling paint thinner

E-Cigarettes (Vaping): Battery-powered devices called e-cigarettes are utilised to heat a liquid substance that generates a vapor, which is then inhaled, thus imitating the smoking process.

Roles and Responsibilities

Approved Provider	• Develop policies and procedures for the effective monitoring of the Service environments to ensure they are kept free of tobacco, vaping devices and substances, drugs and alcohol. • Ensure that children being educated and cared for by the service are provided with an environment free from the use of tobacco, vaping substances, illicit drugs and alcohol. • Ensure that a Nominated Supervisor or a staff member of, or volunteer at, the service is not affected by alcohol or drugs (including prescription medication) so as to impair the person's capacity to supervise or provide education and care to children being educated and cared for by the Service. • Ensure clear signage at the Service to advise of the no-smoking/vaping requirements • Advise new employees and volunteers to the service the Smoking, Drugs and Alcohol Free Environment Policy during the induction process.

	• Provide information about health risks related to smoking, excessive drinking and using other drugs to staff, families and community members, including information about accessing support services
Nominated Supervisor or Responsible Person	• Advise new employees and volunteers to the service of this Policy during the induction process. • During enrolment, inform parents/guardians that the Service environment is free from tobacco, vaping substances and devices, illegal and illicit drugs and alcohol. • Ensure there is smoke-free signage that can be easily seen and understood by the whole community • Provide day-to-day monitoring of compliance and respond to any instances of policy breaches.
All Staff	• Not smoke tobacco or use vaping devices or substances at the Service • Not consume alcohol or be affected by alcohol or drugs (including prescription medication) that impairs their capacity to supervise or provide education and care to the children • Implement appropriate hygiene measures after smoking so that children are not exposed to second-hand and third-hand smoke. • Guide age-appropriate, sensitive discussions about health issues related to tobacco, alcohol and drug use as opportunities arise (e.g. if a child is pretending to smoke). • Not bring alcohol or illegal drugs onto the premises. • Report any instances of suspected alcohol or drug use at the Service
Families and Visitors	• Read and comply with this policy and procedure. • Not consume or be affected by alcohol, tobacco, vaping substances or other drugs when attending the Service. • Comply with the prohibition on all tobacco and vaping substances and devices at the Service. • Not authorise another person to come to the Service whilst they are under the influence of alcohol, tobacco, vaping substances or other drugs. This could result in a refusal to allow them to collect the child or/and intervention by calling the police.

Procedures

Service Environment

Service information for stakeholders (i.e. welcome information and handbooks) will include information regarding the service's *Smoking, Drug and Alcohol-free Environment* requirements.

Through the recruitment and induction process, all staff members and Educators will be made aware of their obligations to ensure a tobacco, vaping, drug and alcohol-free environment is provided.

Appropriate no smoking and alcohol signage will be displayed in prominent locations around the school site to promote the expectation and law. As needed, visitors to the Service will be informed about service's *Smoking, Drugs and Alcohol-free Environment* policy.

Use of Tobacco, Vaping Substances, Drugs and Alcohol

Smoking or vaping is NOT permitted in or on surrounding areas of the OSHC Service. (The smoking ban extends to an area of up to 5m around the land the service is approved to provide education and care).

No employee will be allowed to work under the influence of drugs or alcohol. It is expected that the odour of cigarette/e-cigarette smoke will not be detected on an employee's clothing or hands. If an employee is found smoking on the premises, their employment may be terminated.

If an employee is taking prescription or non-prescription drugs, which could cause drowsiness or otherwise affect their fitness for work, they must advise the Nominated Supervisor so that their ability to work safely

can be monitored. If necessary, medical opinion may be obtained from the individual's Doctor. This is essential to ensure the employee's capacity to supervise and care for children is not impaired.

Reasonable Belief or Suspicion

If there is reasonable belief or suspicion a staff member is affected by drugs or alcohol, the Nominated Supervisor or Approved Provider must be informed immediately. Any incidents or reports are to be documented confidentially, including the action taken that followed the incident or report.

Refer to policy [4.9 Fitness for Work](#) for procedures related to reasonable suspicion of a person being under the influence of drugs or alcohol. If the Nominated Supervisor or Approved Provider has reasonable grounds to believe that an Educator is under the influence of illegal drugs or alcohol, they may be relieved of their duties and procedures as set out in policy [4.9 Fitness for Work](#) will be followed.

Should the Service reasonably suspect that a parent, guardian or person authorised to collect a child/ren is under the immediate influence of alcohol, drug or other substance, procedures as set out in policy [2.3 Safe Arrivals and Departures of Children](#) will be followed.

Breaches of Regulatory Requirements

All staff members and Educators are made aware of this policy through the Service's Induction and orientation processes. Any staff member alleged to have breached this policy will follow the procedures outlined in policies [4.9 Fitness for Work](#) and [4.10 Managing Employee Underperformance and Misconduct](#).

Educators found to be in breach of this policy may be suspended immediately, pending an investigation by the Nominated Supervisor or Approved Provider. Depending on the outcome of any investigations, breaches may result in notification to the Regulatory Authority and/or termination of the Educator's employment.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.82 Environment to be free from tobacco, vaping devices, vaping substances, drugs and alcohol
 - R.83 Staff members and family day care educators not to be affected by alcohol or drugs
 - R.168 Education and care services must have policies and procedures
 - R.170 Policies and procedures are to be followed
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA3 – Physical environment

Additional Regulatory Context and Guidance

- Smoking laws in Queensland <https://www.health.qld.gov.au/public-health/topics/atod/tobacco-laws>
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[2.1 Providing a Child Safe Environment](#)

[3.1 Space and Facilities Requirements](#)

[4.9 Fitness for Work](#)

[4.10 Managing Employee Underperformance and Misconduct](#)

[7.4 Leading Compliance and Quality Assurance](#)

Policy 3.3 Smoking, Drugs and Alcohol-free Environment		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V2-03.2025 – Added additional information to policy statement, additional procedures relevant to vaping and e-cigarettes, smoking odours on employee clothes and prescribed medications.		
V3-10.2025 – Policy renamed from Non-smoking, Illicit Substances and Alcohol Free Environment, added definitions, enhanced policy statement, add family and visitors and enhanced roles and responsibilities, enhanced procedures, additional procedures relevant to reasonable belief or suspicion, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

3.4 Children's Toileting

Policy Statement

The Service is committed to providing a safe, hygienic, and supportive environment that upholds the dignity, rights, and cultural safety of every child. We recognise that toileting is a deeply personal and developmental process, and we are dedicated to ensuring that children receive the support they need with the utmost respect.

The Service leadership team ensures that children's and educators' health, hygiene, and safety are supported through clear procedures and dynamic risk management strategies that align with practices to support children's safety and wellbeing.

Roles and Responsibilities

Approved Provider	• Ensure appropriate facilities and practices are established that prioritise children's safety, privacy, and hygiene. • Ensure the service environment is culturally safe and inclusive, with facilities that respect the diverse needs of all children.
Nominated Supervisor	• Collaborate with the Approved Provider to address any additional requirements to support the needs of all children, especially those with diverse abilities, health conditions, or cultural needs. • Monitor practices to ensure the safety, protection and dignity of children are maintained at all times, with a focus on child-centred and trauma-informed approaches. • Ensure educators are supported with ongoing training and professional development to understand their duties in supporting and supervising children's toileting and hygiene needs. This includes training on child protection, cultural safety, and supporting children with diverse abilities.
All Staff	• Ensure practices are consistent with established procedures and always prioritise children's safety and wellbeing. • Respond to the needs of children to support hygiene, upholding each child's right to privacy, dignity and cultural respect. • Ensure facilities are safe and hygienic through adequate cleaning and the sanitary storage of soiled items.

Procedures

Educators will check all toilet facilities for safety and hygiene prior to the commencement of each session including before school, after school and vacation care. Educators will ensure the facilities are hygienic, functional and free from any identifiable hazards that could compromise children's safety through completion of the *Outdoor Checklist*.

Access

Educators (and any other relevant adult) are not permitted to use the children's toilet facilities during operating hours. Educators (and other adults) are to use the school or OSHC staff toilets.

Children may access the toilets in the New Hall at any time using the buddy system. Additional toilets are accessible for children during each session if needed including the school's boys and girl's toilets.

For shared facilities used by children and adults, the following procedure is in place to protect children and ensure their supervision:

- An educator will notify another team member when they need to use the toilet.
- The educator will ensure no children are in the immediate area of the toilet.
- The staff member will lock the entrance or use a clear sign to indicate the toilet is in use, preventing any children from entering.

Should the primary facilities become unavailable then other toilets may be accessed, however if these are out of sight, children will be escorted to the toilet by an educator.

General Supervision and Transitioning to Toilets

The design of the school site and OSHC building allows line of sight visual supervision of the toilet areas to ensure children are always visible and safe. Educators will endeavour to increase supervision by escorting children to the toilet area, where possible.

When children transition to the toilet from a play area, they will go in small, safe groups. This procedure is designed to ensure a child is never alone and is always under the supervision of an educator or with other children.

Educators will actively monitor and communicate the transition of children to and from the toilets.

Supporting Children's Needs

Educators are required to support the personal hygiene of children with compassion, respect, and discretion. This support is to be provided in a way that promotes a child's independence and dignity.

Educators are not permitted to physically assist children with wiping or dressing themselves unless there is a specific, pre-approved plan in place for children with high support needs. In the event of a personal hygiene incident (e.g., a child soiling themselves), the Nominated Supervisor will be notified immediately. Where a personal hygiene incident requires additional assistance, Educators must inform other team members to ensure a second Educator is present. Gender and developmental consideration should be given to the situation to ensure the most appropriate educator provides assistance to support the child's wellbeing and dignity as the priority.

The Nominated Supervisor will then contact the parent/guardian to discuss the situation and determine the best course of action, which may include the family collecting the child to manage the situation in a way that respects their cultural practices and personal comfort.

A toileting kit will be available (at or near the bathrooms) to assist educators with supporting toileting needs. The kit includes gloves, wipes, hand sanitizer and appropriate bags for soiled materials. All soiled clothing will be placed in a sealed plastic bag and stored discreetly and hygienically until the child is collected. Families may be requested to provide spare clothes or other products to support a child's personal hygiene where necessary.

Communication with the child and their family will always be respectful and discreet, focusing on the child's wellbeing and maintaining a positive relationship.

Additional Support Needs

Educators should understand their role and have suitable skills and training to support children with diverse toileting needs. The Nominated Supervisor is responsible for ensuring staff receive adequate training and support, including specific training for children with high support needs.

Educators must demonstrate empathy and compassion when supporting children. Under no circumstances should they become forceful or cause further embarrassment to the child. The focus is on a trauma-informed approach that builds trust and confidence.

Escorting Children to the Toilet During Excursions

A comprehensive risk assessment will be conducted prior to any excursion to identify and mitigate potential risks to children's safety and privacy during toileting. This will be shared with all families.

On arrival at a venue, an educator will inspect the toilet facilities for hygiene and hazards before any child is allowed to use them.

Children will be escorted in small groups to the facilities, ensuring that an adequate number of educators are present for supervision.

In situations where the facilities are shared, the educator will politely ask other adults to wait until the children have finished, ensuring the children's privacy and safety are not compromised.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.165 Offence to inadequately supervise children
 - s.167 Offence relating to protection of children from harm and hazards
 - s.173 Offence to fail to notify certain circumstances to Regulatory Authority
 - s.174 Offence to fail to notify certain information to Regulatory Authority
- **Education and Care Services National Regulations:**
 - R.109 Toilet and hygiene facilities
 - R.115 Premises designed to facilitate supervision
 - R.168 Education and care services must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA3 – Physical environment
 - QA4 – Staffing arrangements
 - QA6 – Collaborative partnerships with families and communities

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[1.4 Excursions, Incursions and Regular Outings](#)

[2.1 Providing a Child Safe Environment](#)

[2.2 Supervision and Educator Ratios](#)

[2.14 Child Protection and Mandatory Reporting](#)

[3.1 Space and Facilities Requirements](#)

Policy 3.4 Children's Toileting		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V1-03.2025 – No updates		
V2-10.2025 – Updated policy statement, enhanced roles and responsibilities, enhanced procedures, amended procedures relevant to escorting children to the toilet during excursions, additional regulatory context and guidance to align with child safe standards		
V2-04.2026 – No updates		

3.5 Emergency and Safety Equipment

Policy Statement

The personal safety and security of all children, educators, volunteers and visitors, are of highest priority. The Service takes a proactive approach to managing emergencies by developing robust procedures and equipping everyone with the knowledge and resources to respond effectively.

The Service's approach is underpinned by embedded child safe practices, ensuring that our emergency responses are inclusive, child-centred, and trauma-informed.

Roles and Responsibilities

Approved Provider	• Ensure the service is equipped with adequate and risk-assessed equipment to respond in the event of an emergency. • Ensure there are effective mechanisms in place to support the maintenance and integrity of all emergency equipment.
Nominated Supervisor	• Manage the inspection of emergency and safety equipment ensuring it is always ready for immediate and effective use. • Coordinate the timely replacement of any used, damaged or expired equipment with a focus on ensuring the safety of children is never compromised.
All Staff	• Immediately report any concerns or signs of wear or damage to emergency equipment to the Nominated Supervisor • Follow all instructions provided regarding the use of emergency and safety equipment, prioritising the safe evacuation and protection of children.

Procedures

The selection of all safety and emergency equipment is based on legislative requirements and the unique needs identified in our emergency risk assessment, which considers the safety and wellbeing of all children, including those with diverse needs.

Emergency Equipment

- All equipment used in responding to an emergency (alarms, communication devices etc.) will be checked for function and working order each month by the Nominated Supervisor or their delegate. These checks will be recorded to ensure a transparent and auditable safety system.
- Emergency equipment will only be used to respond to a genuine emergency situation.
- Replacement or repair of any faulty equipment is a critical priority. The Nominated Supervisor is responsible for coordinating this task and will communicate any ongoing issues to the Approved Provider for immediate action.

Fire Safety Equipment

- The Nominated Supervisor will coordinate regular maintenance and inspection of all fire safety equipment (fire blankets, extinguishers etc.).
- Fire Safety equipment will only be used by trained staff and only when it is safe to do so, with the primary objective always being the safe evacuation and protection of children.
- Any staff member who notices equipment that has been used, broken or appears impaired must report it immediately to the Nominated Supervisor. All equipment will be replaced or repaired as a priority to ensure our readiness to protect children.
- Fire safety equipment used in a response will be decommissioned (single use only) and replaced.

Training and Instruction

The Nominated Supervisor will ensure that all educators receive comprehensive and regular training in the use of all emergency equipment including fire blankets and fire extinguishers.

Training will not only cover the technical use of the equipment but also emphasise a child-centred approach to emergency responses. This includes understanding how to calmly manage children's stress and fear during an emergency and ensuring all children, regardless of their background or needs, are supported.

Emergency equipment locations will be clearly indicated by appropriate signage that is easily understood by all staff.

The Approved Provider will seek advice from the Queensland Fire Service (or another appropriate Authority) to provide up-to-date information on the appropriate measures which are required to comply with this aspect of this Policy.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.97 Emergency and evacuation procedures
 - R.98 Telephone or other communication equipment
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.174 Time to notify certain circumstances to Regulatory Authority
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Work Health and Safety Act 2011](#) and [Regulation 2011](#)
- [Building Fire Safety Regulation 2008 \(Qld\)](#)
- [Managing the Work environment and Facilities Code of Practice 2011](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[2.1 Providing a Child Safe Environment](#)

[2.13 Emergency Evacuation, Lockdown and Drills](#)

[7.4 Leading Compliance and Quality Assurance](#)

Policy 3.5 Emergency and Safety Equipment		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V1-03.2025 – No updates		
V2-10.2025– Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V2-04.2026 – No updates		

3.6 Resources and Equipment

Policy Statement

The Service recognises that resources and equipment are integral to fostering a sense of belonging, security, and cultural identity. Our resources and equipment are carefully selected to be safe, high-quality, and developmentally and culturally appropriate which supports our commitment to providing quality education and care while ensuring children's safety and wellbeing.

The Service believes that meaningful learning and development opportunities are best delivered through a program rich with diverse, inviting, and accessible resources. Our budget and procurement activities will actively reflect this commitment, with a focus on ensuring resources are adequate, culturally representative and kept in a safe, clean and well maintained condition.

Educators have an ongoing responsibility to maintain and inspect all resources to ensure their continued suitability, safety and cultural appropriateness. Daily checks are a core part of our commitment to maintaining a healthy and safe environment for all children.

Roles and Responsibilities

Approved Provider	• Ensure the resources and equipment provided are adequate, developmentally and culturally appropriate, safe and in good repair. • Ensure the procurement of new resources and equipment is informed by the diverse backgrounds and needs of all children in our care, including Aboriginal and Torres Strait Islander children. • Specific equipment requirements of children with additional needs will be supported to ensure an inclusive environment. • Resources and equipment will be chosen to reflect the cultural diversity of the Service's community and the cultural diversity of contemporary Australia, including the incorporation of the Aboriginal and Torres Strait Islander community.
Nominated Supervisor	• Monitor and respond to any issues relating to the repair, hygiene and safety of resources and equipment with a focus on mitigating any potential risks to children's safety and wellbeing. • Collaborate with the Approved Provider and educators to identify opportunities for improvement and to enhance the program with culturally significant and trauma-informed resources. • Lead the procedure for requesting and sourcing additional or replacement resources and equipment, ensuring that the child's voice and family input are central to this process. • Actively seek the input of parents/guardians regarding current interests of their children to ensure appropriate toys and equipment are purchased
All Staff	• Proactively monitor and report any safety, hygiene, or repair issues with resources and equipment to the Nominated Supervisor immediately. • Supervise children with a focus on promoting their safety, wellbeing and development and ensure that resources are used in a way that respects all children and prevents misuse or harm. • Provide ideas for equipment and materials purchased based on the needs and interests of children attending the OSHC service. • Incorporate commercial, natural, recycled, homemade, and real resources that can be used in a variety of ways to encourage children's learning and creativity

Procedures

Education and Care Resources and Equipment

The service will ensure the resources and equipment provided for education and care are:

- Sufficient in number and in good working order to support the needs of all children, including those with additional needs.
- Diverse and varied, reflecting the cultures, languages, and abilities of the children in our care, to support all aspects of the program.
- Open ended and flexible resources and materials allowing children to be creative and independent in their play, including musical instruments, dress-ups, cd's and/or a stereo.
- Reflective of different languages and children's first language,
- Flexible enough to allow children to safely and independently access them to extend their learning, promoting autonomy and self-directed learning.

Furniture, materials and equipment are selected to be developmentally and culturally appropriate, inclusive and adaptable to ensure every child can participate fully in the program. Equipment provided will be appropriate to the interest, developmental and cultural needs of the children, is flexible and able to be rearranged or adjusted to provide additional interest, variety, challenge and support the inclusion of children with additional needs.

The management team will provide a wide range of materials including natural, recycled and homemade items to support children's learning in a range of ways. Children will be encouraged to access outdoor areas with natural elements such as trees, plants, edible gardens, sand, rocks, mud and water to promote children's connection to the environment, which is particularly important for Aboriginal and Torres Strait Islander children.

Educators are encouraged to work collaboratively with children and families to understand their needs interests, and cultural perspectives to inform the selection and use of resources.

The Nominated Supervisor will ensure all equipment is regularly and thoroughly checked, cleaned and maintained. This includes adhering to manufacturer's instructions and conducting additional checks as necessary to guarantee that all items are in a safe, hygienic, and good working order for children's use.

Any broken, damaged, or unsafe equipment will be immediately removed from use and disposed of after the Nominated Supervisor has been notified. The safety of the children is our first priority.

The Nominated Supervisor will ensure that the Service has the correct amount of equipment to support the children-to-educator ratios and the individual needs of the children, as outlined in our risk assessments.

Safe storage and shelving will be provided to allow children to independently access equipment and resources wherever possible, while minimising the risk of injury.

Resources and Equipment to be Safe, Clean and in Good Repair

The Nominated Supervisor or delegated person will ensure that all equipment is regularly checked, cleaned and maintained in accordance with manufacturer's instructions and otherwise as reasonably necessary to ensure that it remains in a safe and good working order. Broken equipment will be disposed of after notifying the Nominated Supervisor or delegated person.

Educators will regularly check furniture and equipment for stability and wear and tear (corners, surface-splinters, missing bike handle grips, faulty cleats in boards or ladders, heavy objects on climbing frames that destabilise the equipment, etc.).

A record of any furniture or equipment that needs maintenance will be kept in the *Equipment and Maintenance Record* and educators will ensure this is reported to the Nominated Supervisor for further action.

A comprehensive inspection of all outdoor equipment including timber structures, swings, ropes, chains, slides and playground surfaces and impact areas is conducted on an annual basis with the Approved

Provider notified of any safety or risk concerns and the equipment immediately placed out of bounds to ensure children's safety.

Administration Resources and Equipment

The Service will ensure adequate administrative resources are available to:

- Conduct and support the Service's documentation and communication.
- Support efficient business practices and responsibilities in providing quality care.

The service will gather information and resources for access to advise and support parents/guardians and families.

Purchasing and Development

The Service will plan and budget for the continual development of resources and equipment ensuring that the program remains responsive to the evolving needs and interests of the children.

Educators and families will be actively encouraged to contribute ideas and identify opportunities for purchasing suitable culturally inclusive, and safe resources.

Our Quality Improvement Plan (QIP) will identify opportunities to enhance the service's provisions with a specific focus on embedding cultural safety and promoting the wellbeing of children.

Care will be taken when purchasing equipment to ensure it complies with relevant Australian Standards (available from Standards Australia) and is suitable for its intended purpose, with a strong emphasis on the safety and durability of all items.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.73 Educational program
 - R.103 Premises, furniture and equipment to be safe, clean and in good repair
 - R.104 Furniture, materials and equipment
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA3 – Physical environment
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[1.1 Educational Program Development and Implementation](#)

[2.1 Providing a Child Safe Environment](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.9 Budgeting, Procurement and Financial Planning](#)

Policy 3.6 Resources and Equipment		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V1-03.2025 – No updates		
V2-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional procedures relevant to resources and equipment to be safe, clean and in good repair, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – removed duplicated information and amended procedures for annual check of outdoor equipment		

3.7 Environmental Responsibility and Sustainability

Policy Statement

The Service recognises the importance of encouraging the awareness of environmental responsibility and implements practices that contribute to a sustainable future and actively participates in caring for our environment and promotes sustainable practices through educating and working with the children, families and wider community. As a community, we can create, encourage, and increase awareness of being environmentally responsible and ensure they engage and involve staff, children and families to be successful.

Children are supported to become environmentally responsible and show respect for the environment. We practice and promote sustainability through reducing waste, minimising consumption, and protecting and conserving wildlife and natural habitats.

Roles and Responsibilities

Approved Provider	• Network with the local community to keep up to date with current practices and ideas for being environmentally responsible. • Provide professional development opportunities for educators to learn about integrating environmentally sustainable education into all areas of their program
Nominated Supervisor	• Review policies and procedures to achieve more sustainable outcomes • Conduct environmentally responsible audits to ensure consistency and continuous improvement
All Staff	• Ensure sustainable practices are incorporated into the daily routine • Collaborate with families and the community for involvement in activities that promote sustainability

Procedures

The Approved Provider will collaborate with the Nominated Supervisor, educators, staff, parents/guardians, children and others at the service to develop a sustainability plan which describes the service's practices in relation to:

- Water usage,
- Energy efficiency,
- Waste management,
- Use of chemicals,
- Air quality,
- Care of animals and vegetation; and
- Consideration of the local environment.

Environmental sustainability strategies for implementation will be identified as part of the sustainability plan and may include strategies such as:

- Colour-coded bins for Landfill only, Organic waste, Paper recycling, Mixed recyclables.
- Use of electronic communication where possible to reduce paper use within the office and in each room for newsletters, billing, and other communication needs

Educators are encouraged to engage in activities that support the service to become more environmentally sustainable (e.g. recycling) and incorporate environmental education and sustainable practices within the service program including planning opportunities for children to connect with nature and the natural world at the service and on excursions.

The service will encourage links and networking with parents/guardians and the community on environmental issues by keeping them informed of what the Service is doing and being aware of what others can bring to the Service.

Sustainable Practices

Recycling	• Provide bins and signage for waste and recycled materials • Recycle paper and all other recyclable rubbish • Use recycled water (e.g. for watering gardens) • Using recycled items in craft activities
Gardening	• Plant vegetables, herbs, and fruit trees • Establish composting or worm farms for scraps • Give food scraps to worms or service pets, or to a staff member to take home for their pet/s • Provide education to children about activities such as 'garden to plate' activities through using the produce grown in the service menu • Provide opportunities for children to participate in experiences such as seed sprouting, vegetable gardening, cooking with what is grown, and provide education about weeds
Energy Conservation	• Install LED lighting where possible • Turn off non-LED lights when not in use • Turn off electrical appliances at the outlet when not in use • Use natural ventilation and insulated blinds/drapes rather than air conditioning when temperatures are not extreme
Water Conservation	• Encourage children and staff to turn off the taps and ensure leaking taps are fixed immediately • Collect rainwater and use in the garden and for water/sand play • Use water play water on the garden rather than tipping out at the end of the day • Collect excess drinking water and measure it before using it for watering the garden
Nature and Wildlife	• Use natural materials – trees, blocks, boxes etc. in arts and crafts and play • Create play spaces for children to interact with the natural environment • Educate children about the natural decomposition cycle through exposure and participation in worm farms and composting food scraps • Plant 'bird attracting' plants and install a birdbath • Plant 'butterfly attracting' plants • Create a lizard lounge • Collaborate with wildlife educators to assist in educating children
Office and Administration	• Purchasing and using print-paper from 100% recycled sources, • Purchasing and using greyscale/toner-saving printer settings where possible, • Purchasing and using double-sided printing where possible, • Recycling ink-cartridges at the school-administration, • Recycling batteries via local programs, • Recycling used stationary appropriately, where possible, • Recycling printers, phones, walkie-talkies and other electricals and appliances at the appropriate venues, • Disposing of confidential documents via a shredding company that recycles the paper afterwards.
Kitchen	• Composting food scraps via compost, worm-farms, or other appropriate methods, • Purchasing and using environmentally friendly chemicals (E.g. low-phosphorous, bio-degradable, and/or non-toxic).
Bathrooms	• Purchasing and using toilet-paper from 100% recycled sources, • Purchasing and using handtowels from more sustainable sources, • Purchasing and using environmentally friendly chemicals (E.g. low-phosphorous, bio-degradable, and/or non-toxic).

Craft	• Using recycled items in craft activities, • Recycling scrap office-paper for use, • Purchasing and using non-acrylic-based paints, • Focusing on the use of non-plastic-based craft materials, and reducing the use of plastic-based materials, • Incorporating natural materials into activities, • Programming explicit environmentally themed crafts and activities (e.g. World Ocean Day, Clean-Up Australia Day, National Tree Day etc.).

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
- **Education and Care Services National Regulations:**
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA3 – Physical environment
 - QA7 – Governance and leadership

Related Policies and Procedures

[1.1 Educational Program Development and Implementation](#)

[2.2 Providing a Child Safe Environment](#)

[3.1 Space and Facilities Requirements](#)

Policy 3.7 Environmental Responsibility and Sustainability		
Version and reason for change	Date Implemented	Date of Review
V1-06.2024 – New policy		
V2-03.2025 – Added additional sections to sustainability practices table		
V2-10.2025 – No updates		
V2-04.2026 – No updates		

Policy Group 4

Staffing Arrangements and Employment

Staffing arrangements foster **friendly, courteous interactions** and give children access to **a secure and predictable setting**.

Children are encouraged to actively participate in the learning programme by qualified and experienced educators. An atmosphere where children feel emotionally safe, secure, and happy is influenced by the connections among all staff members.

The emphasis of Quality Area 4 is on providing educators with the knowledge and training necessary to build trusting, respectful relationships with children, establish predictable learning environments, and motivate children to actively participate in the program. An excellent service thrives on a cooperative, ethical culture where professional norms govern all elements of operations.

Adjacent to arranging staff are the matters that govern the employment relationship. This policy group combines both Quality Area 4 requirement and employment expectations.

4.1 Recruitment and Employment of Educators

Policy Statement

The Approved Provider is committed to being a child safe organisation and upholding the Child Safe Standards as recommended by the Queensland Government. Our recruitment, selection and screening processes play a vital role in protecting children from harm ensuring that all educators and staff are not only suitably qualified but also demonstrate a strong alignment with our child-safe culture, philosophy, and values.

The Service's educators are central to the quality of education and care provided. Therefore, recruitment, selection and ongoing employment practices are designed to ensure the wellbeing and safety of children are the primary considerations at every stage.

Commitment to Equal Employment Opportunity

The Service is committed to being an Equal Employment Opportunity (EEO) employer, ensuring fair and equitable employment practices are undertaken across all workplace activities, including recruitment and selection. Recruitment and employment decisions will be lawful, transparent, non-discriminatory and underpinned by a commitment to child safety. Selection will be based on merit with candidates' demonstrating their suitability through their level of knowledge, skills and ability to fulfill the requirements of the position as outlined in the selection criteria included in the Position Description and with a particular emphasis on their understanding of and commitment to child protection.

Applicants will be given a fair and equitable chance to compete for an appointment based on merit. The selection of candidates will be lawful at all times, ensuring protected attributes are never the basis for decision-making (i.e. discrimination).

Ongoing Employment

The Service recognises the importance of employing and retaining quality employees who demonstrate ongoing commitment to child safety, the wellbeing of children, and culturally safe practices. The Service has established employment practices that are lawful, transparent, non-discriminatory and include the continual development and retention of quality employees, ensuring a consistent and safe school age care program.

Definitions

Equal Employment Opportunity (EEO): is ensuring that all employees are given equal access to promotion, appointment or other employment related opportunities without regard to any factor not related to their competency and ability to perform their duties.

Discrimination: is treating an individual with a particular attribute less favourably than an individual without that attribute or with a different attribute under similar circumstances. It can also be seeking to impose a condition or requirement on a person with an attribute who does not or cannot comply while people without that attribute do or can comply.

Roles and Responsibilities

Approved Provider	• Develop clear policies and procedures for employee vacancies to ensure key values, skills and attributes related to child safety are explicitly identified when advertising vacancies. • Appoint suitable persons for employment at the service ensuring all probity checks and child protection screening requirements are met. • Ensure selection processes are fair, meritorious and rigorously focused on an applicant's suitability to work with children.
Nominated Supervisor	• Work collaboratively with the Approved Provider to ensure suitable candidates are recommended and selected for appointment with a focus on their demonstrated commitment to a child-safe environment.

	• Lead the orientation and induction of educators ensuring they are fully trained on the service's child protection policies, procedures, and child safe practices. • Maintain accurate and secure records and documentation related to recruitment, employment and all child safety screenings.
Educator/employee	• Complete and return all employment documents including mandatory child protection screening forms, within the timeframes required. • Actively participate in the service's induction and orientation program with a specific focus on understanding and implementing child-safe practices. • Effectively complete the orientation and induction checklist throughout the probationary period, demonstrating a clear understanding of their role in protecting children. • Be engaged in ongoing training and upskilling in relation to their job role and required tasks including child safety and wellbeing.

Procedures

Job analysis

Position Descriptions (PDs) will be developed for all positions within the Service and will explicitly outline the key functions of the roles and identify essential and desirable selection criteria. PDs will generally include the following information:

- position title and key position information (e.g. reporting lines)
- position objective – a summary of the main objectives of the role.
- key responsibilities and accountabilities
- selection criteria which outlines the essential qualifications, skills, experience and knowledge required for the role.
- clear expectations about commitment to child safety (Child Safe Standards).

The selection criteria for each vacant position will take the following into consideration with an emphasis on an applicant's suitability to work with children:

- Qualifications, skills and abilities required for the position
- Experience required for the position
- Skills and abilities required for the position
- Mandatory employment screening requirements including verifying Working With Children Check (WWCC), where applicable National Police Criminal History checks and immunisation requirements.

The composition, quantity and engagement of the service's staffing arrangements will be decided by the Approved Provider and will be as a result of workforce planning which determines the workforce needs of the service.

All recruitment activities will be instigated with the expressed approval of the Approved Provider.

Recruitment Activities

The Approved Provider will ensure a fair, lawful (non-discriminatory) and child-safe recruitment process is undertaken for all vacancies. Comprehensive PDs for each advertised position will be available for all applicants.

Vacant permanent part-time positions may be offered internally if the Approved Provider in conjunction with the Nominated Supervisor feel there is a suitable internal candidate/s. All decisions relating to promotion and career development will be made without regard to any matters other than the individual's inherent capacity and ability to carry out the requirements of the position including their performance history.

If there are no suitable internal candidates identified, the position will be advertised externally as per the procedures of this policy.

Promotion and advertisement of available positions can include:

- a. Local social media pages,
- b. Job seeking platforms or QCAN website,
- c. School newsletters.

Advertisements will include a description of the position, and the selection criteria and will explicitly state the service's commitment to child safety. Candidates will be asked to write a cover letter outlining their suitability for the position referencing the selection criteria and provide a copy of their resume. The advertisement may state that only shortlisted candidates will be contacted.

In accordance with the Service's commitment to reconciliation and promoting a culturally competent workplace, suitably qualified and experienced Aboriginal and Torres Strait Islander people will be encouraged to apply for available positions. An inclusive EEO statement which encourages Aboriginal and Torres Strait Islander applicants will be included in advertising for vacancies.

Short-listing Candidates

1. Unless otherwise stipulated, the Approved Provider, with support from key service leaders, will be responsible for coordinating the shortlisting of candidates with a primary focus on selecting individuals who demonstrate a strong alignment with our child-safe values.

Interviewing

1. Shortlisted candidates will be notified to their progression and be invited to interview for the position.
2. Interviews will be conducted by the OSHC Manager or a panel of a minimum of two employer representatives. Panel members will have an understanding of child-safe recruitment practices.
3. Interview questions will be based on the selection criteria for the position and will include specific questions designed to assess an applicant's understanding of child safety, professional boundaries, and appropriate responses to child protection concerns.
4. All candidates will be asked the same interview questions to ensure a fair and equitable selection process is conducted.

Selection

1. Unless directly appointed by the Approved Provider, the delegates conducting interviews will make a recommendation to the Approved Provider outlining their reason for selection.
2. Before making a verbal offer to the preferred candidate, a delegated person will conduct preferably two referee checks.

Pre-Employment Screening, Probity and Reference Checks

Effective pre-employment screening and checks are paramount to our child safe commitment and ensures the Service is compliant with legislative and regulatory requirements to engage employees with the skills, experience, qualifications and general 'fit' for their role.

All prospective staff members or volunteers will be asked if they are aware of any enforcement action the Regulatory Authority may have taken against them and will be required to complete a *Prohibition Notice Declaration for Prospective Staff Members* to confirm they are not prohibited from providing education and care.

The Nominated Supervisor will do a name and date of birth search of the *register of prohibited persons and suspended educators through the [National Quality Agenda IT System](#)* to confirm that a person is not prohibited from providing education and care in any education and care service, being engaged as a family day care educator or being nominated as a nominated supervisor.

If the search results in a match, the Nominated Supervisor will contact the Regulatory Authority to confirm the information. The Nominated Supervisor will keep and retain a note that the register was checked and the date and name of the person who checked it, including when there is no match, to show the Regulatory Authority if asked.

All preferred candidates will undergo an appropriate and rigorous pre-employment screening process including a validated Working With Children Check (Blue Card), and where applicable National Police criminal history checks before an offer of employment is made. Employees involved in the administration of Child Care Subsidy are required to undertake additional background checks and be linked through PRODA.

Verbal reference checks will be conducted for all preferred applicants with questions specifically designed to ascertain the applicant's attitudes, behaviours, and performance in previous child-related roles, and their commitment to professional boundaries and child safety. Reference check questions will follow questions as outlined in the standard *Reference Check Form*. Where possible references should be from the immediate previous employer.

Measures will be in place to ensure probity checks are completed by a person or persons who have no prior professional relationship with the applicant to mitigate the perception of bias.

Appointment

1. Once endorsed by the Approved Provider, the selected candidate will be verbally offered the position and negotiate a starting date.
2. The newly appointed employee will be emailed:
 - a. a letter of offer/employment agreement including the PD,
 - b. code of conduct,
 - c. a request for copies of relevant qualifications, and
 - d. links to/copies of the Employment Information Statement relevant to the Queensland Industrial Relations System.
3. The service will complete and lodge an application form to confirm the validity of a new employee's Blue Card.
4. The Service will ensure details of the appointed Educator are added to the National Early Childhood Worker Register within 14 days of their employment and the Register updated within 14 days of becoming aware of any change to a worker's information.
5. Unsuccessful interviewees will be verbally notified as soon as possible by a nominated person from the selection panel.

Probationary Period

Each new employee (apart from casual employees) is subject to a probationary period of three (3) months. This period serves as a vital opportunity to assess their suitability for the role, particularly their commitment to child safety and alignment with the service's values. During this time employees will receive advice, training and guidance to help them become familiar with and competent in their role, with a strong focus on child-safe practices.

An employee's ongoing appointment is subject to their demonstrated commitment to child safety and the satisfactory completion of the probationary period. During probation, if it is clear that the employee is not suitable for the role they have been employed to perform, the employer may terminate the employee by providing one week's notice in writing, or by payment in lieu of notice.

Casual Employment

Casual educators will be engaged at the discretion of the Nominated Supervisor. The 'reasonable enquiries' required for employing casual educators will include (but not be limited to):

- Requesting an appropriate resume from the candidate
- Undertaking a thorough interview that includes questions about child safety.,
- Completing a minimum of two referee checks, with a focus on their suitability to work with children.
- Validating their Working with Children Check (Blue Card) and obtaining copies of appropriate qualifications.

Casual educators will be required to undergo the full induction and orientation process to ensure they have a clear understanding of the Service's policies, procedures and child safe practices.

Casual educators are to abide by confidentiality and privacy legislation in regard to employees, management, children and families within their care. They are to treat any information shared with them professionally and sensitively

Conflicts of Interest in Recruitment

The Service may at times employ family members or personal friends of employees. The following procedures will apply in addition to the above employment procedures:

1. There will be no preferential treatment for family members/personal friends in the employment relationship; such conduct will be taken seriously, and disciplinary action will be followed if a conflict of interest has not been managed transparently or according to procedure.

2. No appointment of a family member or personal friend will be made without following the agreed recruitment process.
3. All candidates will be asked to disclose any actual or perceived conflicts of interest as part of the selection process.
4. Persons with responsibility for decision-making are additionally responsible for disclosing any actual or perceived conflicts of interest to the Approved Provider, who will appoint a suitable alternative delegate where relevant.

Ongoing management of employees where a conflict of interest exist is covered in policy [4.10 Managing Employee Underperformance and Misconduct](#).

Orientation and Induction

All new employees will be given a minimum 2 hour induction with a specific focus on equipping them with the knowledge and understanding to create a safe and nurturing environment for children.

Induction will include, but is not limited to:

- Comprehensive training on the service's Child Protection Policy, Code of Conduct, and the Queensland Child Safe Standards.
- A walk-through of the service premises, with a specific focus on identifying potential risks to children's safety and understanding emergency plans.
- A discussion with the Nominated Supervisor to outline and introduce duty of care responsibilities, supervision practices, and the importance of professional boundaries.
- Receiving the Service Employee Welcome Information Pack, containing the Employee Handbook, Employee Details Record Form and Confidentiality/Privacy Agreement.
- Location and orientation of:
 - The Service policies and procedures.
 - National Quality Standard for Education and Care Services.
 - My Time, Our Place Framework for School Age Care in Australia.

Each educator's first shift will be paired with a suitably experienced educator to 'shadow' them with a debrief at the end of the shift to ensure a clear understanding of their child protection responsibilities.

Within the first two weeks of employment commencing, the Nominated Supervisor (or their delegate) will meet with the employee to ensure the Induction and Orientation checklist is being completed, signing that they have received appropriate and effective induction. The Induction and Orientation checklist has been developed to support a new educator's knowledge and understanding of their role throughout the probationary period of their employment. Once completed it will be securely filed in the employee's personnel file.

Employee Retention

The Service will actively work towards supporting educators to develop professionally through:

- Encouraging and supporting attendance at workshops on child safety, wellbeing, and culturally safe practices,
- Supporting networking opportunities,
- Supporting higher education and qualification attainment,
- Enabling 'on the job' development and learning through coaching, mentoring and effective leadership,
- Providing regular opportunities for team members to come together and share thoughts and ideas enabling critically reflective practice on their role in creating a child-safe culture.

The Service may provide benefits for employees who demonstrate an ongoing commitment to their role and use professional standards effectively to guide their practice through reward and recognition programs which may include:

- Employee of the month,
- Appreciation certificates,
- Service awards recognising tenure milestones,
- Career advancement/promotion,

- Staff fee discount,
- Other rewards as deemed appropriate by management.

Employment Exit Interviews

The Service will offer confidential exit interviews to ascertain reasons for staff turnover with the intention to develop strategies to improve job satisfaction and the employee experience.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.162A Child protection training
 - S.162B Child safety training
- **Education and Care Services National Regulations:**
 - R.128B Child protection training
 - R.128D Foundation child safety training
 - R.128E Advanced child safety training
 - R.154A National Early Childhood Worker Register
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.299 General qualification requirements for educators—children over preschool age
- **National Quality Standard:**
 - QA4 – Staffing arrangements
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Anti-Discrimination Act 1991 \(Qld\)](#)
- [Industrial Relations Act 2016 \(Qld\)](#)
- [Queensland Employment Standards](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [2.1 Providing a Child Safe Environment](#)
- [2.2 Supervision and Educator Ratios](#)
- [2.17 Child Safety and Wellbeing](#)
- [4.3 Working with Children Checks and Management](#)
- [4.6 Code of Conduct](#)
- [4.8 Employee Qualifications – Monitoring Progress](#)
- [4.9 Fitness for Work](#)
- [4.10 Managing Employee Underperformance and Misconduct](#)
- [4.11 Prevention of Workplace Bullying, Discrimination and Harassment including Sexual Harassment](#)
- [7.5 Governance and Management](#)
- [7.6 Privacy and Confidentiality of Records](#)
- [7.12 Workplace Health and Safety](#)

Forms and Resources

[Referee check](#)

Policy 4.1 Recruitment and Employment of Educators		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V2-06.2024 – Additional information about recruitment and ongoing employment, included procedures relevant to retention and exit interviews, equal opportunities and discriminatory practices, employee assistance program		
V3-03.2025 – Added additional information to policy statement, additional information to AP and Educator roles and responsibilities, procedures relevant to selection criteria, casual educators, pre-employment screening and checks, probationary period and orientation and induction.		
V4-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, removed procedures relevant to employee assistance program, additional regulatory context and guidance to align with Qld P&C legislative requirements and child safe standards		
V5-04.2026 – added reference to National Worker Register and prohibited persons and suspended educators register in procedures relating to pre-employment screening, added references to National Law and Regulations		

4.2 Employee Remuneration and Entitlements

Policy Statement

The Approved Provider recognises the value of a high-quality workforce and acknowledges the contribution that pay and conditions have on employee satisfaction and performance and therefore will ensure that all employees are appropriately remunerated and receive entitlements in accordance with the relevant award.

The Approved Provider also acknowledges that educators will from time to time be requested to act in a higher duty position, providing informed consent prior to undertaking any additional responsibilities. Those educators who provide consent to act in a higher duty position shall be remunerated at a level consistent with the additional responsibilities.

The Approved Provider recognises its employees, particularly casual educators, may seek to have increased stability of their employment and where relevant, they may seek to request a transition from casual to permanent employment. The Approved Provider recognises that employees have a right to request flexible working arrangements and will follow the required processes.

Employees may, on occasions, be provided with the opportunity to complete administrative or computer-based work from their own home. The provision of this flexibility will be at the discretion of the Approved Provider.

Roles and Responsibilities

Approved Provider	• Ensure employees are paid as per the current industrial award for their position • Ensure employees are informed of their relevant award and know how to access the relevant award • Regularly review workforce capacity to determine employee casual conversion opportunities • Review opportunities for working from home arrangements where necessary
Nominated Supervisor	• Approve all employee timesheets • Delegate higher duty responsibilities as necessary • Maintain records and documentation related to higher duty appointments • Support casual employees with requests for employment conversion • Monitor employees with working from home arrangements • Monitor and advise the Approved Provider of employee leave accruals

Procedures

Payments to Employees

Employees will be required to submit a timesheet for approval to the employer or the employer's delegate each fortnight. The timesheet will be reviewed and processed once approved.

Incomplete and inaccurate timesheets will not be approved, and the employee will be requested to rectify the oversights within a reasonable timeframe. Intentionally inaccurate timesheets may be considered fraudulent when hours claimed to have been worked, have not been worked.

Claims for additional hours must be approved by the employer prior to being worked, other than in the event of an emergency or unforeseen event such as a parent/guardian being late to collect a child. Additional hours will be accrued as TOIL and taken in accordance with the relevant award requirements.

Timesheets will not be authorised by family members or associated persons. Where the Nominated Supervisor has a member of the family working in the Service, timesheets will be authorised by a nominated representative of management.

Pay slips will be provided to an employee within one day of their pay being processed. An employee's end of year payment summary, PAYG (Pay as You Go) summary, as required by the Australian Taxation Office, will be available to employees at the end of each financial year through their MyGov account.

Negotiated Above Award Conditions

The Approved Provider may negotiate above award terms and conditions for employees to ensure they provide a competitive employment arrangement which includes the capacity to retain qualified, experienced and skillful employees.

In making such a decision, the Approved Provider will consider:

- General employment market rates
- Performance and experience,
- Qualifications, skills and knowledge,
- Compliance history,
- Business, educational and change leadership capability; and
- Innovation and strategic planning endeavours.

Higher Duties

All educators acting in a higher duty position will be provided with a clear Position Description that defines the higher duty role.

The educators performing higher duties must agree in writing to undertaking this additional responsibility and this will be maintained on the Service's Staff Record. Remuneration for educators performing higher duties will be calculated as per the relevant award.

Responsible Person Delegation

Generally, remuneration as the Responsible Person is taken into account for award payments aligned to Assistant Coordinator and Educational Leader roles.

Employees remunerated at lower levels who are asked to, are deemed capable of and agree to act as the Responsible Person-in-Charge, shall be remunerated an hourly award-based payment for acting in such a role as determined appropriate.

Flexible Working Arrangements

The Service appreciates the advantages to the continuity of care and impact on employee wellbeing as a result of flexible working arrangements therefore, any offers or requests for flexible working arrangements will be considered on their individual merits and be based on reasonable business needs.

Request for Flexible Working Arrangements

The right to request a flexible working arrangement applies to all employees. An employee seeking flexible working arrangements must make their request in writing (via email) to the Approved Provider. The written request must state the proposed change in sufficient detail to allow the Approved Provider to make a decision about the request and state the reasons for the change.

Decision-Making

The Approved Provider will acknowledge receipt of the employee's request and communicate potential timeframes for decision-making. Before responding to the request, the Approved Provider will consult with the employee about their request and what will change if the request is accepted.

The Approved Provider may grant the request:

- in full,
- in part, or
- subject to certain conditions.

The Approved Provider must make a determination within 21 days.

The Approved Provider reserves the right to refuse the request however it must be based on reasonable grounds and the employee must be given written notice of the decision including the reasons for the decision.

If the Approved Provider refuses, partly refuses or imposes conditions on the requested flexible working arrangement, they must include in their written response the reasons for the decision, including identifying the reasonable grounds for refusal, partial refusal or imposition of conditions.

Conflicts of Interest

Where a conflict exists between the Approved Provider and the employee, in relation to a request to transition from casual employment, then the relevant procedures in policy [4.1 Recruitment and Employment of Educators](#) will be followed.

Entitlements and Allowances

Gifts and Benefits

Employees shall not be permitted to obtain any personal benefits such as kickbacks and rewards programs from purchases made by the employer for resources, equipment, food or other goods. All rewards programs connected with the Service shall be for the sole use of the Service unless otherwise approved by the Approved Provider.

Employee Working From Home Arrangements

Employees offered working from home arrangements will be required to complete a relevant work health and safety assessment to ensure the work environment and practices support the health and safety of the employee. In making a determination for an employee to work from home the Approved Provider must be satisfied that all safety risks and concerns have been considered and addressed where necessary. Employees working from home will be able to address any safety issues with the Nominated Supervisor or the Approved Provider at any time and they must continue to monitor for safety issues and report these immediately to their manager for resolution.

The Approved Provider may not have the capacity to provide devices for each employee offered working from home arrangements therefore employees will have an opportunity to use their personal device for some aspects of their work.

When working from home, the employee will be supervised remotely by the Nominated Supervisor, and this could include video teleconference, emails or phone calls to update on progress and report any critical information. The employer recognises their duty to ensure all workers, including those working from home are protected from harm as far as reasonably practicable. Where the employee cannot fulfil the requirements to work from home safely or productively, the opportunity will be withdrawn.

While working from home, the Service's policies and procedures will apply. Employees must ensure their conduct is consistent with the expectation of the Service while working from home.

Employee Leave

The Service management seeks to ensure that all employee leave entitlements are managed in accordance with clearly articulated guidelines so as not to negatively impact on the operations of the Service. This policy shall include all applicable forms of leave entitlements.

Application for leave entitlements

Annual Leave, Long Service Leave, Leave Without Pay

All employees seeking to take extended leave should submit their request in writing to their employer well in advance of the proposed leave period, where possible. Requests for Annual Leave or Leave Without Pay must be submitted in writing to the Approved Provider at least two weeks prior to such leave being requested. Employees requesting Long Service Leave must submit their request, in writing to the Approved Provider, at least 3 months prior to the leave being taken.

Management shall approve such leave unless the impact of leave is detrimental towards the successful operations of the Service. Should leave not be approved, the employee shall be entitled to have notification and rationale including the grounds for refusal within 3 working days of the original request for leave.

Sick and Carer's Leave

All sick and carer's leave shall be reported to the immediate supervisor as soon as practicable to ensure a suitable replacement can be obtained. The Service shall have pre-planned arrangements for filling shifts when educators call in sick.

If this is the Nominated Supervisor, then such report shall be made to the person expected to assume responsibility for the Service on that day or throughout the duration of leave. This person must be either the Approved Provider or delegated as a Responsible Person.

Leave accruals

The Service management shall ensure that employees do not accrue any more than 6 weeks' annual leave per annum. This shall be monitored through providing a balance sheet with annual audited reports documenting leave accruals. Employees shall receive notification of their leave accruals on their pay slip. All types of leave shall be appropriately recorded on rosters and timesheets.

Parental Leave and Related Entitlements

Under the Queensland Employment Standards (QES), all employees are eligible for unpaid parental leave if they have worked for their employer for at least 12 months of continuous service.

An employee can take a period of up to 12 months of unpaid leave and can request an extra 12 months (up to a total of 24 months). The request to extend it must be in writing and given to the employer at least 4 weeks before the end of the first leave period. Unpaid parental leave applies to employees who have, or will have, the responsibility for the care of a child. Parents who experience a still birth or death of an infant within the first 24 months of life can also take parental leave.

Employees who are entitled to paid or unpaid Parental leave have the right to return to their pre-parental position at the end of the leave or in the case of an employee who was transferred to alternative duties, to the position held immediately prior to this transfer. Where such a position no longer exists, but other positions are available for which the employee is qualified and capable of performing, they will be entitled to a position as nearly comparable in status and salary to their former position.

Employees on parental leave are also entitled to 'keeping in touch' days where an employee performs work on a day or part of a day. Keeping in touch days are designed to assist employees stay connected with the workplace whilst on parental leave.

An employee may request a flexible work arrangement when returning from parental leave. Where practicable the Approved Provider and Nominated Supervisor will support the employee's return to work and continuity of care for the children by offering flexible work hours.

Family and Domestic Violence Leave

This entitlement is for employees who are experiencing family and domestic violence. The entitlement is 10 days per annum (non-cumulative) paid leave for permanent full-time or part-time employees and pro-rotas leave for casual employees when required.

Where Family and Domestic Violence Leave has been exhausted, other leave entitlements may be used including sick/carer's leave entitlements, annual leave, long service leave or leave without pay.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations:**
 - R.168 Education and care service must have policies and procedures

- R.170 Policies and procedures to be followed
- R.171 Policies and procedures to be kept available
- R.299 General qualification requirements for educators—children over preschool age
- **National Quality Standard:**
 - QA4 – Staffing arrangements
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Parents and Citizens Association Award – State 2016](#)
- [Work Health and Safety Act 2011](#)
- [Industrial Relations Act 2016 \(Qld\)](#)
- [Queensland Employment Standards](#)

Related Policies and Procedures

- [4.1 Recruitment and Employment of Educators](#)
- [4.3 Working with Children Checks and Management](#)
- [4.6 Code of Conduct](#)
- [4.9 Fitness for Work](#)
- [4.10 Managing Employee Underperformance and Misconduct](#)
- [7.5 Governance and Management](#)
- [7.6 Privacy and Confidentiality of Records](#)
- [7.12 Workplace Health and Safety](#)

Forms and Resources

- [WH&S Working from Home Safety Assessment](#)

Policy 4.2 Remuneration and Entitlements		
Version and reason for change	Date Implemented	Date of Review
V1-06.2024 – New policy		
V2-03.2025 – Added additional procedures relevant to parental leave and related entitlements and Domestic and Family Violence Leave.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, removed procedures relevant to transition to casual employment, added procedures relevant to flexible working arrangements, additional regulatory context and guidance to align with Qld P&C legislative requirements and child safe standards		
V3-04.2026 – No updates		

4.3 Working with Children Checks and Management

Policy Statement

The Approved Provider is committed to being a child-safe organisation and to upholding the Queensland Child Safe Standards. A fundamental part of this commitment is ensuring that all individuals associated with the operations of the Service and working directly with children hold a positive notice Blue Card (or an exemption) and are not identified as a prohibited person for working with children.

The Service will maintain rigorous records and processes to ensure the suitability of all relevant persons and strict compliance with statutory obligations, thereby providing a safe environment for all children.

Roles and Responsibilities

Approved Provider	• Ensure a comprehensive blue card register is maintained at the service. • Ensure all relevant notifications are reported to Blue Card Services in a timely manner, including any changes in an employee's Blue Card status or the cessation of their employment. • Ensure a robust, secondary system is in place to verify the validity of Blue Cards, separate from the reliance on employees providing a copy of their card. This is to mitigate the risk of fraudulent documents. • Ensure prospective staff members or volunteers complete a <i>Prohibition Notice Declaration for Prospective Staff Members</i> to confirm they are not prohibited from providing education and care. • Ensure Educator details are checked with the <i>register of prohibited persons and suspended educators</i> prior to their employment. • Ensure Educator details and information are added to <i>National Early Childhood Worker Register</i> within 14 days of their employment and within 14 days of becoming aware of any change to the information.
Nominated Supervisor	• Ensure all individuals have a valid Blue Card linked to the organisation prior to commencing any duties that involve working with children. • Maintain the service's blue card register cross-referencing it with the Blue Card Services Organisation Portal to ensure accuracy and up-to-date information. • Educate all personnel on their responsibility to maintain their Blue Card and to notify the service of any changes to their circumstances that may affect its validity.

Procedures

Positive Notice Requirements

All employees, volunteers and executive members of the Approved Provider must hold a current and valid Positive Notice for Child Related Employment/Volunteer Blue Card before commencing with the Service. In accordance with Queensland Government legislation, volunteers and students under 18 years of age may be exempt from holding a positive notice Blue Card (Working with Children Check).

All prospective paid employees will not be engaged to work at the Service without being in receipt of a current blue card. Evidence of a valid 'paid' blue card / or a valid volunteer blue card with receipt that a form has been submitted to transfer from Volunteer to Paid, must be submitted to the Service before commencing employment.

Employees are responsible for the cost and timely renewal of their Blue Card. The Nominated Supervisor will provide clear and timely reminders to staff about upcoming expiry dates to prevent any lapse in their Blue Card status, which would require them to cease work immediately.

Linking Blue Cards to the Organisation

All individuals requiring a Blue Card will be linked to the organisation through the Blue Card Services Organisation Portal. This is the primary method of verification to ensure all checks are valid.

The Nominated Supervisor will ensure this linking is completed before the person's first day of work.

The Approved Provider will be responsible for managing Organisation Portal access, ensuring that only authorised personnel can access this sensitive information, in line with confidentiality and privacy standards.

Blue Card Register

A blue card register will be maintained at the Service containing the copies of blue cards of all employees, volunteers and executive members of management. The register will be referred to by the Nominated Supervisor/Administrator on a regular basis to track expiry dates and ensure all cards remain valid. The Nominated Supervisor will cross-reference the physical copies of Blue Cards with the official Blue Card Services portal to ensure their authenticity and validity.

Renewal Monitoring

The Nominated Supervisor will confirm the upcoming Blue Card expiries on a monthly basis, by using either the Organisation Portal or phoning Blue Card Services.

All individuals with an expiry date within the following 8 weeks will be notified in writing and given clear instructions on the renewal process. A record of this communication will be kept. As long as an individual submits their renewal application before their current card expires, they may continue in their role. If an individual allows their Blue Card to expire, they will be required to cease all child-related duties immediately until a new, valid card is received.

Police History Changes

While Blue Card Services will notify the Service of relevant changes, the Nominated Supervisor will actively encourage all staff to promptly and discreetly notify them of any changes to their police history. This open communication is a key component of fostering a child-safe culture.

Exiting Employees and Volunteers

The Nominated Supervisor will notify Blue Card Services when a person leaves their employment with the Service via the Organisational Portal. This is a mandatory requirement that prevents the misuse of the Blue Card and ensures a comprehensive and accurate record-keeping system, thereby upholding the integrity of the child protection system.

Prohibited Person Checks

All prospective staff members or volunteers will be required to complete a *Prohibition Notice Declaration for Prospective Staff Members* to confirm they are not prohibited from providing education and care.

The Nominated Supervisor will complete a name and date of birth search of the *register of prohibited persons and suspended educators through the [National Quality Agenda IT System](#)* to confirm that a person is not prohibited from providing education and care in any education and care service, being engaged as a family day care educator or being nominated as a nominated supervisor.

If the search results in a match, the Nominated Supervisor will contact the Regulatory Authority to confirm the information. The Nominated supervisor will keep and retain a note that the register was checked and the date and name of the person who checked it, including when there is no match, to show the Regulatory Authority if asked.

National Worker Register

The Approved Provider will ensure Educator details and information are added to the *National Early Childhood Worker Register* within 14 days of their employment.

The Approved Provider is responsible for maintaining Educator information on this register and updating within 14 days of becoming aware of any change to their personal information.

The Approved Provider must also ensure all casual and relief Educators engaged through an external agency have their details added to the *National Early Childhood Worker Register* within 14 days of their engagement at the Service.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.162A Child Protection Training
 - s.162B Child Safety Training
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.128B Child protection training
 - R.128D Foundation child safety training
 - R.128E Advanced child safety training
 - R.145 Staff record
 - R.146 Nominated supervisor
 - R.147 Staff members
 - R.148 Educational Leader
 - R.149 Volunteers and students
 - R.150 Responsible person
 - R.154A National Early Childhood Worker Register
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety
 - QA3 – Physical environment
 - QA4 – Staffing arrangements
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000](#)
- [A New Tax system \(Family Assistance\) Act 1999 \(Cth\)](#)
- [Department of Education - Child Care Provider Handbook](#)
- [Work Health and Safety Act 2011](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)
- [Information sheet - Early childhood worker register | ACECQA](#)

Related Policies and Procedures

[2.1 Providing a Child Safe Environment](#)

[2.2 Supervision and Educator Ratios](#)

[2.17 Child Safety and Wellbeing](#)

[4.1 Recruitment and Employment of Educators](#)

[4.5 Volunteers and Students](#)

[4.6 Code of Conduct](#)

[4.8 Employee Qualifications – Monitoring Progress](#)

[4.9 Fitness for Work](#)

[4.10 Managing Employee Underperformance and Misconduct](#)

[4.11 Prevention of Workplace Bullying, Discrimination and Harassment including Sexual Harassment](#)

[7.5 Governance and Management](#)

[7.6 Privacy and Confidentiality of Records](#)

[7.12 Workplace Health and Safety](#)

Policy 4.3 Working with Children Checks and Management		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V1-03.2025 – No updates		
V2-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – Policy renamed from Working with Children Check (Blue Card) Management, enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, added procedures relevant to Prohibited Person Checks and National Educator Register		

4.4 Employee Uniform and Dress Code

Policy Statement

The Approved Provider requires educators and other employees engaged to work with children in OSHC to present themselves and wear a standard of dress appropriate to the circumstances and environment in which they will be working. This policy is designed to promote a professional, safe, and culturally respectful environment that supports the wellbeing of all children and staff.

In administering this policy, consideration will be given to any work health and safety requirements (including personal protective equipment), the need to ensure that clothing and accessories do not pose a risk of harm to children and the importance of ensuring that all personal appearance standards are respectful and inclusive of diverse cultural and religious identities.

Roles and Responsibilities

Approved Provider	• Maintain a ready supply of sun smart uniform shirts and personal protective equipment (PPE) • Establish expectations for employee personal appearance during the recruitment process and at commencement in line with this policy's commitment to child safety and cultural respect.
Nominated Supervisor	• Distribute the Service uniform shirts to all relevant employees • Ensure sufficient PPE is available for employees to access • Monitor employee's standard of dress and take appropriate action if necessary, ensuring all decisions are fair and culturally sensitive. • Monitor work health and safety issues relevant to employees' jewellery, body piercings and/or other accessories to prevent any foreseeable risk of harm to children.
Employees	• Ensure uniform, name badge and other appropriate clothing are worn when working at or representing the Service • Use PPE including wearing a sun safe broad brimmed hat at all times when working in the outdoor environment • Ensure jewellery, body piercings and/or other accessories are appropriate for working with children and do not pose a strangulation, choking, or scratching hazard. • Ensure all tattoos visible to children and families are respectful, non-offensive and do not include content that is violent, sexual, or otherwise inappropriate.

Procedures

Employee Uniform

The Approved Provider requires that educators and other employees engaged to work with children in OSHC maintain a high standard of personal presentation whilst on duty and dress appropriately for the circumstances and environment in which they will be working. At all times, an Educator's dress and appearance should be professional and conducive to active participation with children.

The Approved Provider is committed to cultural safety and acknowledges the diverse cultural and religious standards of its employees. Clothing worn to comply with cultural or religious standards should not pose a foreseeable risk to health and safety at work, and every effort will be made to find a practical solution that respects the employee's identity while maintaining a safe environment.

Upon commencement, educators and other employees will be issued with an OSHC uniform shirt which must be kept laundered and in good condition. The number of uniform shirts issued to an employee will be determined by the Approved Provider and will depend on their employment status (e.g. full time, casual). OSHC uniform shirts will comply with recommended Sunsmart guidelines and include a collar and mid-length sleeve. Educators will receive a laundry allowance for the uniform shirts, as per the relevant award.

All educators will be required to wear the OSHC provided uniform shirt while on duty at the Service. The Service uniform shirt can be worn prior to, and after their designated shift however, whilst in the public view, the educator will be required to conduct themselves in a manner that will not be detrimental to the reputation of the Service. Managerial employees performing administration duties and contractors may not be required to wear a uniform shirt however will be required to comply with general dress code requirements. Where educators are required to attend special events, conferences, courses or seminars, OSHC uniform requirements still apply unless specifically directed by the Nominated Supervisor or Approved Provider.

Prior to receiving their allocated service uniform shirt/s, educators will not be permitted to wear clothing that is:

- Tight or revealing (i.e. midriff tops, clothing that reveals undergarments, shirts with spaghetti straps, low-cut tops); or
- Displaying inappropriate images or words; or
- Damaged, including clothing that is ripped or torn.

Educators will be required to supply their own shorts or pants with consideration given to the appropriateness of such clothing when actively working with the children. Shorts and/or pants are required to be no shorter than mid-thigh length with consideration given to ensuring that private areas remain covered at all times.

In some circumstances it may not be practicable for educators or other employees to wear the Service uniform such as during pregnancy or for religious requirements. In such cases, educators and other employees should comply with the general dress code requirements and seek approval from the Nominated Supervisor or Approved Provider.

Educators will be provided with a service name badge and/or identification card which must be worn whilst on duty at the Service. Name badges and/or identification cards must be kept clean and should be worn so that they are clearly visible.

Educators who leave the employment of the Service will be required to return all service uniform shirts to the Nominated Supervisor in a clean and laundered state as part of the exit process. Old or unwanted uniform items should not be given to charities, other people or organisations but should be returned to the Nominated Supervisor for disposal.

Personal Protection Equipment – Clothing and Footwear

In order to comply with the Sun Safety Policy of the Service, educators and other employees will be required to wear a broad-brimmed hat when outdoors. Educators will be responsible for supplying their own broad-brimmed hat and ensuring it is at the Service when required.

Educators will be required to wear enclosed protective footwear at all times. The standard requirement will be a sandshoe or jogger however consideration may be given to other types of footwear provided that it encloses the foot and is not a strap-on type of footwear. All footwear must meet the work health and safety requirements of the Service and be conducive to active participation with the children.

Personal Safety and Appearance

Educators or other employees with long hair will be required to secure their hair and tie it back when working with the children and/or handling and preparing food.

Work, health and safety requirements will be considered when determining if jewellery, excessive jewellery, body piercings and/or other accessories worn by educators are appropriate when working with children.

Educators will be encouraged to:

- Wear small sleeper or stud type earrings; and
- Minimise the wearing of large or protruding rings; and
- Minimise the wearing of long, dangly necklaces; and
- Minimise the amount of jewellery worn when working with the children.

To ensure their safety and that of the children and colleagues, educators are requested to maintain their fingernails at a safe and workable length and to minimise any nail decorations and/or embellishments.

Educators are expected to maintain a high standard of personal care, ensuring that:

- Hair is clean and tidy,
- Personal hygiene includes deodorant and/or antiperspirant,
- Clothing is laundered and kept in good repair.

The Service acknowledges the educators' right to individual cultural and creative expression through piercings (facial, tongue or body) and/or tattoos however, there is an expectation for educators to ensure that:

- All piercings comply with the Service's work, health and safety requirements; and do not pose a safety risk to children (e.g., catching on equipment or presenting a choking hazard).
- Tattoos visible to children and families are respectful, non-offensive, and do not display content that is violent, sexual, or otherwise inappropriate.

Breaches of the Uniform and Dress Code

If the Nominated Supervisor determines that the educator's dress or appearance does not comply with these requirements, a determination will be made as to whether the educator is allowed to remain at work or must leave work to change their clothing. In any circumstance that an educator is requested to return home and change the Nominated Supervisor will ensure that the educator/child ratios of the Service are maintained.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations:**
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA4 – Staffing arrangements
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Work Health and Safety Act 2011](#)
- [Anti-Discrimination Act 1991 \(Qld\)](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[4.1 Recruitment and Employment of Educators](#)

[4.5 Volunteers and Students](#)

[4.6 Code of Conduct](#)

[4.11 Prevention of Workplace Bullying, Discrimination and Harassment including Sexual Harassment](#)

[7.5 Governance and Management](#)

[7.6 Privacy and Confidentiality of Records](#)

[7.12 Workplace Health and Safety](#)

Policy 4.4 Employee Uniform and Dress Code		
Version and reason for change	Date Implemented	Date of Review
V1-06.2024 – New policy		
V1-03.2025 – No updates		
V2-03.2025 – Policy renamed from employee uniform and personal presentation, enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V2-04.2026 – No updates		

4.5 Volunteers and Students

Policy Statement

The Service recognises that volunteers, including students on unpaid placements, play a positive and valuable role in enriching our programs and supporting a collaborative approach to education and care. This policy is designed to ensure that the involvement of every volunteer is not only aligned with our service objectives and regulatory compliance but also with the highest standards of child safety, wellbeing, and cultural safety. We are committed to a zero-tolerance approach to child harm, as mandated by the Queensland Child Safe Standards.

The Approved Provider recognises that volunteers, like all staff, have the right to a safe and supportive environment, and will ensure clear communication, respect for their contributions, and a culture that values their role in creating a child-safe space.

All volunteers will receive a comprehensive induction that ensures the safety and wellbeing of the children is the primary focus and ensures they understand their responsibilities to adhere to our service's policies and procedures, maintain confidentiality, and engage in interactions that uphold the safety, respect, dignity and cultural inclusivity of all children.

Ongoing, consistent and respectful supervision will be provided to all volunteers to ensure they have clear direction and feel valued within our service. Every volunteer will work under the direct guidance of a designated employee, ensuring their practices align with our programs, philosophy and most importantly, our child safe culture.

Roles and Responsibilities

Approved Provider	• Ensure robust procedures are in place to monitor and maintain the suitability and management of all volunteers to uphold the safety and wellbeing of children. • Ensure secure and confidential records are maintained to demonstrate compliance with all child-safe and legislative requirements. • Ensure all volunteers and students have successfully completed the foundation modules of the National Mandatory Child Safety Training and their details are recorded on the National Early Childhood Worker Register
Nominated Supervisor	• Ensure strict compliance with all child safe standards and legislative requirements. • Lead a suitable child-safe suitability assessment and a comprehensive induction to support a volunteer's engagement, with a strong focus on child safety, wellbeing, and cultural safety. • Complete all necessary documentation and maintain relevant, confidential records, including documentation from the training provider/university for practicum placements.
Responsible Person in Charge	• Actively monitor the conduct of volunteers and their interactions with children, ensuring they are always professional, appropriate, and child centred. • Support the volunteer's learning and development, providing a safe space for them to ask questions and seek guidance on child-safe practices.
Employees	• Act as a child-safe role model for volunteers, guiding them in their interactions with children and helping them understand appropriate conduct. • Ensure the safety and wellbeing of children by supporting a volunteer's understanding of the Service's child protection procedures and expectations. • Report any concerns about a volunteer's conduct or interactions with children immediately to the Nominated Supervisor, without delay, in line with our child protection reporting procedure.

Volunteers	• Adhere to the Service's Child Protection Policy, Code of Conduct, and all child-safe procedures. • Successfully complete the foundation modules of the National Mandatory Child Safety Training and provide the Certificate to the Approved Provider. • Follow all reasonable directions from supervisors, with a commitment to prioritising the safety and wellbeing of every child. • Immediately report any concerns or disclosures from a child to a designated staff member or the Nominated Supervisor.

Key Tasks and Responsibilities

Assessing suitability	The Nominated Supervisor is responsible for ensuring any volunteer engaged at the service meets the relevant requirements for suitability, including holding a working with children check and demonstrating an ability to suitably educate and care for children.
Induction and supervision	The Nominated Supervisor is responsible for ensuring induction procedures are followed and the volunteer is suitably trained prior to education and care responsibilities. The Nominated Supervisor or Responsible Person will ensure the volunteer has a suitable educator to guide practices and provide direct supervision.
Record Keeping	The Nominated Supervisor will manage the administration tasks, including the relevant record keeping.

Procedures

Blue Card (Working With Children Check)

Volunteers must hold a valid Blue Card (or an exemption) linked to the Service before they commence any duties that involve working with children. This is a non-negotiable component of our child-safe screening process.

The Nominated Supervisor will ensure an application to 'Link a cardholder to the organisation' is lodged with Blue Card Services upon commencement and will verify the card's validity.

In line with current Queensland Government legislation, volunteers and students under 18 years of age may be exempt from holding a Blue Card. However, such volunteers will be required to provide a written parent/guardian authority and must be approved by the Approved Provider prior to volunteering. This is to ensure we have parental consent and full knowledge of their presence.

Record of Volunteer Details

All volunteers and/or students will complete a *Volunteer Details Form* to record relevant details including (but not limited to):

- Full name,
- Address,
- Blue card details (number and expiry),
- Contact details,
- Work they are interested in and proposed volunteering times.

Suitability and Induction

The Nominated Supervisor will meet with any prospective volunteer to conduct a suitability assessment, ensuring they have the expected knowledge, skills, and, most importantly, a demonstrated commitment to child safety and wellbeing.

All volunteers and students will be required to successfully complete the foundation modules of the National Mandatory Child Safety Training and provide the certificate before being engaged in any work directly with children at the service.

It is the responsibility of the Approved Provider executive, employees of the Service, volunteers and students to make a declaration of any conflict of interest as soon as this becomes known to the person. This declaration should be made to the Approved Provider.

An induction process will be undertaken prior to any volunteer's first interaction with children. The induction will explicitly cover:

- The Service's Child Protection Policy and Code of Conduct, including our commitment to the Queensland Child Safe Standards.
- Mandatory reporting requirements and the procedure to follow when a child discloses abuse, neglect, or harm.
- Procedures for managing feedback and complaints, with a focus on child-friendly processes.
- Professional boundaries, appropriate interactions, and the importance of creating a culturally safe environment for all children.

Conduct, Supervision and Engagement

All volunteers will be asked to sign as agreeing to abide by the Code of Conduct, acknowledging their understanding and commitment to upholding the child-safe standards and behaviours expected of all staff.

Volunteers will be supported and directly supervised by a designated, experienced educator at all times. This mentorship is crucial for ensuring the volunteer understands and implements our child-safe practices correctly.

Volunteers under the age of 18 *must* be directly and actively supervised at all times by a staff member who holds a current and valid Blue Card. This is a critical risk mitigation strategy.

A record of attendance, including the date and specific times of their presence, must be completed for every volunteer shift to ensure we have a clear, auditable record of who is in our service at all times.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.162A Child Protection Training
 - S.162B Child Safety training
 - s.169 Offence relating to staffing arrangements
 - s.170 Offence relating to unauthorised persons on education and care service premises
 - s.175 Offence relating to requirement to keep enrolment and other documents
- **Education and Care Services National Regulations:**
 - R.128B Child protection training
 - R.128D Foundation child safety training
 - R.128E Advanced child safety training
 - R.145 Staff record
 - R.149 Volunteers and students
 - R.151 Record of educators working directly with children
 - R.154A National Early Childhood Worker Register
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA4 – Staffing arrangements

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#) and [Regulations 2011](#)
- [Work Health Safety Act 2011 \(Qld\)](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[2.1 Providing a Child Safe Environment](#)

[2.14 Child Protection and Mandatory Reporting](#)

[2.17 Child Safety and Wellbeing](#)

[4.3 Working with Children Checks and Management](#)

[4.6 Code of Conduct](#)

[4.9 Fitness for Work](#)

[4.11 Prevention of Workplace Bullying, Discrimination and Harassment including Sexual Harassment](#)

[7.5 Governance and Management](#)

[7.6 Privacy and Confidentiality of Records](#)

[7.12 Workplace Health and Safety](#)

Forms and Resources

[Volunteer Details Form](#)

Policy 4.5 Volunteers and Students		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V1-03.2025 – No updates		
V2-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – added information relevant to National Mandatory Child Safety Training requirements and National Early Childhood Worker Register, added references to National Law and Regulations		

4.6 Code of Conduct

Policy Statement

The Approved Provider expects that all people connected to the Service, in particular employees and other individuals interacting with children, to conduct themselves in a manner that upholds the highest standards of professionalism, ethical practice and commitment to the safety, wellbeing and cultural safety of all children and young people. Our Code of Conduct serves as a roadmap for professional, ethical and child-safe behaviour and is more than just a set of rules; it is a statement of our collective values, the principles that guide our interactions, and the standards against which we measure all conduct. By adhering to this code, personnel are not merely complying with a set of rules, but actively safeguarding children's rights, fostering inclusion, and contributing to a culture of respect, integrity, safety and high-quality education and care.

Our Code of Conduct serves as an essential framework, outlining the behaviour standards and ethical considerations that underpin a positive and productive community. All stakeholders benefit from clear guidelines that delineate what is expected, what is encouraged, and what is unacceptable.

We recognise that cultural safety, particularly for Aboriginal and Torres Strait Islander children, requires that their identity is respected, their culture is valued, and their right to connect with community and Country is upheld. This Code commits all personnel to practices that are free from racism, bias, and discrimination, and that actively promote inclusion for children from all cultural backgrounds.

Commitment to a Safety Culture

The safety, wellbeing, and cultural security of children is a fundamental principal of the Service. Being part of an education and care service requires fostering of positive relationships between adults, children and their families while ensuring no action or inaction compromises a child's physical, emotional, cultural, or psychological safety.

The Approved Provider has developed clear expectations for behaviour to support safe, respectful and inclusive interactions, forming a significant part of the Code of Conduct and aligning with our Child and Youth Risk Management Strategy and the Queensland Universal Principle and Child Safe Standards

The Child Safe Standards reflected in this code include:

- Dignity and Rights: Every child and young person is treated with dignity, respect and cultural sensitivity.
- Participation: Every child and young person is empowered to express their views; these views are heard and considered in decisions affecting them.
- Wellbeing: Every child and young person is supported to live a good life, with opportunities to grow, thrive and maintain connections to culture.
- Safety: Every child and young person is protected from harm, physical, emotional, psychological and cultural.
- Equity: Every child and young person has fair access to opportunities, with reasonable adjustments made to meet their individual needs.

This requires active participation and collaboration from every individual within the Service with leaders modelling a child-safe culture in every decision, action, and interaction.

A Shared Responsibility

The Approved Provider acknowledges responsibilities in relation to the Queensland Government's Statement of Shared Commitment to ensure a respectful, supportive, and safe environment is created for children and young people.

This requires active participation and collaboration from every individual and while high standards of behaviour are expected for all employees, those in manager/advisory roles have even higher expectations to lead a culture that reflects a positive and professional attitude of their work, act collegially, and support the needs and safety of the children and families accessing the Service.

This means that every person in our Service, from management to casual educators and volunteers, plays a direct role in protecting children, upholding their rights, and embedding cultural safety in daily practice.

Compliance and Accountability

Adherence to this Code of Conduct is mandatory for all staff, volunteers, students, and where relevant, parents/guardians. Any breach of this Code will be treated as a serious matter, as it can expose children to harm, undermine cultural safety, and erode trust.

The service maintains clear systems for:

- Reporting concerns (including mandatory reporting obligations under the Child Protection Act),
- Investigating allegations in a trauma-informed and culturally sensitive manner,
- Taking corrective and protective action where needed.

Roles and Responsibilities

Approved Provider	• Establish and maintain a Code of Conduct for all individuals who may interact with children and young people • Ensure all employees are provided training and guidance to meet child safety and cultural safety expectations. • Investigate concerns or breaches where the Code of Conduct has not been upheld in a manner that prioritises child safety and wellbeing.
Nominated Supervisor	• Ensure employees/volunteers sign the Code of Conduct prior to commencement • Orientate staff to the Code of Conduct on commencement, with emphasis on child safety and cultural safety obligations. • Monitor Educator and staff behaviour to ensure compliance with child-safe and culturally safe practice. • Model appropriate standards of behaviour in all interactions. • Guide reflection of the Service's expectation for employees and respond in instances where there are concerns about employee conduct. • Escalate any concerns or allegations to the Approved Provider immediately.
Responsible Person in Charge	• Actively monitor workplace interactions to identify and address unsafe or culturally unsafe behaviours. • Lead by example in maintaining a child-safe and culturally respectful environment. • Follow reporting procedures for concerns or breaches.
All Staff	• Act consistently with the Code of Conduct and child-safe principles. • Report any unsafe, discriminatory, or harmful behaviour immediately. • Challenge conduct that undermines a child's safety, wellbeing, or cultural identity.

Key Tasks and Responsibilities

Establishing a clear framework for behaviour	The Approved Provider is responsible for the development, implementation and ongoing education of the Code of Conduct. These are to set out the standards and expectations of behaviour required for stakeholders, especially employees and volunteers of the service.
Following behaviour expectations	All persons connected to the service must display behaviours and make judgements compatible with the expectations set out in the Code of Conduct, especially employees and volunteers of the service.
Reporting concerns	Any educator can report concerns around a person's behaviour to the Nominated Supervisor, or the Approved Provider. The Approved Provider is responsible for ensuring relevant management action is carried out to investigate and respond to concerns or breaches.

Procedures

Application

Employees and volunteers will be required to sign a copy of the Service Code of Conduct prior to commencing employment or whenever this policy is updated and to acknowledge their commitment to its child safety and cultural safety provisions. Training in child-safe and culturally safe practices will be provided on induction and refreshed regularly. A copy of this Code of Conduct is contained in the Educator Handbook provided on employment.

Employees must demonstrate an understanding and commitment to the Code of Conduct as they will be expected to consistently uphold the agreement during their employment with the Service. The Nominated Supervisor will be responsible for monitoring and immediately addressing any concerns of educator and/or volunteer conduct. Employees with concerns about the Nominated Supervisor's conduct are encouraged to communicate directly with the Approved Provider. Breaches will be addressed promptly, with priority given to the safety and wellbeing of children. Where a breach involves a risk of harm, mandatory reporting obligations will be followed.

Any updates to the Code of Conduct will be required to be acknowledged by all employees.

Inappropriate Conduct

As per s.166A of the *Education and Care Services National Law*, the Approved Provider, Nominated Supervisor, Educators and volunteers must not subject a child being cared for by the Service to conduct that a reasonable person would consider to be inappropriate within an education and care service.

In addition, Approved Providers and Nominated Supervisors must also ensure that no child is subjected to conduct that a reasonable person would consider to be inappropriate.

Instances of inappropriate conduct towards children must be reported to the Approved Provider and will be taken seriously. All allegations of inappropriate behaviour will be fully investigated and the outcomes recorded. The Approved Provider is required to make notification to the Reportable Conduct Scheme within three days of receiving a report of inappropriate conduct. Failure to report may result in financial penalties for the Approved Provider.

Conflict of Interest

A conflict of interest may arise when an individual's personal interests e.g., family, friendships, private business activities, could compromise their judgment, decisions, or actions in the workplace.

All Employees are required to disclose in writing to the Nominated Supervisor the existence of any potential or actual conflicts of interest that may impact their duties at the Service including detailing what the actual or potential conflict of interest is, potential mitigation options and any other relevant information. Note: This requirement also extends to individuals in the recruitment process applying for employment at the Service

Examples of conflict of interest, or circumstances which may lead to a conflict of interest arising include, but are not limited to:

- Undertaking secondary employment for families/caregivers who attend the Service in the form of "babysitting", or
- Working alongside, or in a manager/employee relationship with a close relative (for example, partner, parent, sibling), or
- Working in the immediate area/room as a child attending the Service who is a close relative (for example, child, sibling, step-child, foster-child, niece/nephew, grandchild), or
- Being involved in a decision relating to the selection, appointment or promotion of a close relative or associate.

The Nominated Supervisor will review all declarations. Where the Nominated Supervisor forms the view that an actual or perceived conflict of interest has or may arise, advice will be sought from the Approved Provider in regard to how to mitigate the risk.

Breaches of Conduct

The Service expects all persons to comply with the conduct outlined in this policy. Likewise, any persons suspecting breaches of this Code are to immediately report details to the Nominated Supervisor or Approved Provider.

Breaches to the Code of Conduct will be taken seriously and may result in disciplinary action taken by the Approved Provider up to and including termination of employment. Allegations of breaches of the Code of Conduct by employees will be managed through underperformance and misconduct proceedings (refer policy [4.10 Managing Employee Underperformance and Misconduct](#)),

The Service Code of Conduct

1. General Principle

The Approved Provider expects that all persons engaged with any of the operations, support or management of the P&C organisation will display the highest standards of professional and personal conduct in the discharge of their duties. The expected behaviour expressed in this policy is consistent with our commitment to our *Child and Youth Risk Management Strategy* and aligns with the National Principles for Child Safe Organisations and Queensland Child Safe Standards.

2. Coverage

The Approved Provider Code of Conduct applies to:

- The Management Committee
- All employees
- Volunteers

3. Obligations

The conduct of managers, employees and volunteers (personnel) should uphold the Approved Provider's commitment to safety and professionalism. In doing so, all relevant persons should:

- Comply with the organisation's policies and procedures and legislative requirements and obligations.
- Perform duties in a responsible and professional manner.
- Promote the organisation's reputation and the value to the broader community.

4. Relationships and Interpersonal Behaviour

Approved Provider's personnel are expected to foster sound working relationship, as they will:

- Treat everyone with courtesy, respect, consideration throughout their interactions and communication with others.
- Be sensitive and responsive to the dignity and rights of others, refraining from interacting in a manner that impacts on the rights of others, including not engaging in any form of:
 - Harassment, including sexual harassment
 - Discrimination (e.g. based gender, age, race, impairment, disability, religious beliefs, political beliefs, sexual orientation or identity)
 - Bullying
 - Victimisation
 - Culturally insensitive or disrespectful behaviour
- Act in good faith and honesty with the responsibility and delegation placed within your position.

5. Cultural Safety and Inclusion

Approved Provider's personnel are expected to actively promote and maintain a culturally safe environment for all children, families, and communities, especially for Aboriginal and Torres Strait Islander people. This is achieved by:

- Treating all individuals with respect for their cultural identity, heritage, and unique experiences.
- Engaging in continuous learning to enhance cultural awareness and competence.
- Celebrating cultural diversity and promoting an inclusive environment for all.
- Challenging and addressing racism and discrimination in all its forms.

6. Teamwork

Approved Provider's personnel are expected to build cooperation and partnership, and should:

- Foster teamwork and collegiality among all internal stakeholders, expressing gratitude to the effort and contribution others bring.
- Consider the impact on your decision and behaviour on the wellbeing of others – refrain from acting in a manner that would reasonably distress, intimidate, undermine or threaten a colleague or stakeholder.
- Display a constructive attitude when navigating conflict and grievances with others.
- Refrain from acting in any way that would unfairly harm the reputation or position colleagues.

7. Privacy and Confidentiality

Approved Provider's personnel are expected to maintain the organisation's commitment to privacy and confidentiality, particularly around the organisation's sensitive and personal information, and should:

- Not share or disclose information that is not consistent with a fair, just or reasonable purpose.
- Ensure that information collected by the organisation is only used for the purpose intended.
- Ensure the security of information is maintained.

8. Stewardship

Approved Provider's personnel are expected protect the resources and finances of the organisation, and should:

- Use the organisation's resources properly and responsibly for legitimate purposes only
- Strive to obtain value for the organisation's purchases and spending.
- Avoid waste and secure organisation's belongings against theft or fraud.

9. Professionalism

Approved Provider's personnel are expected to be professional and should:

- Perform duties diligently, conscientiously and with integrity to the best of your ability.
- Maintain knowledge of professional and ethical standards relevant to your area of expertise — engaging learning and development opportunities to enhance your capacity to perform, as required.

10. Conflicts of Interest

Approved Provider's personnel are expected to act ethically for the best interest of the organisation and should:

- Not take improper advantage of any official information gained in the course of our employment.
- Ensure that financial or non-financial interest does not conflict, or appear to conflict, with or compromise the obligations and requirements of your duties and performance.
- Avoid actual or perceived conflicts of interest through transparency in decision-making and declaring potential conflicts of interest for impartial management.

11. Safety and Health

Approved Provider's personnel are expected to uphold a safe and healthy environment and should:

- Uphold a duty of care, especially where services care for the needs of children.
- Take responsibility for the health and safety of yourself and others when carrying out duties.
- Present to your role with adequate fitness, alertness and hygiene to perform the duties.
- Not be under the influence of drugs or alcohol, or prescribed medication that may affect mental alertness.
- Not to smoke or vape on premises or within five metres of the service premises, including not exposing children to secondary smoke/nicotine or vaping substances on hands or clothing.

12. Fairness and Resolution

Approved Provider's personnel are expected to deliver a fair and reasonable response to concerns of others and should:

- Facilitate a fair process for responding to compliance, grievances and disputes.
- Uphold ethical decision-making to promote fairness, justice and collaborative partnerships for stakeholders.

13. Interactions and Relationships with Children

Approved Provider's personnel are expected to act in a manner that upholds the safety, protection, and respect of children, including:

- Actively listening to children and valuing their voices, feedback, and concerns.

- Building positive, respectful, and trusting relationships with children.
- Never leaving a child unsupervised.
- Prohibiting all forms of physical punishment, emotional abuse, neglect, or sexual misconduct.
- Maintaining children's dignity and rights.
- Guiding and supporting children toward acceptable behaviour and choices.
- Not compromising professionalism and boundaries of children and their families.
- Never expose children to
 - Inappropriate, harsh or sexualised language, or
 - physical punishment.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.165 Offence to inadequately supervise children
 - s.166 Offence to use inappropriate discipline
 - s.166A Offences relation to inappropriate conduct
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.155 Interactions with children
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA3 – Physical environment
 - QA4 – Staffing arrangements
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [United Nations Convention on the Rights of the Child](#)
- [National Principles for Child Safe Organisations](#)
- Queensland Government [Statement of Shared Commitment](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[2.1 Providing a Child Safe Environment](#)

[2.17 Child Safety and Wellbeing](#)

[4.3 Working with Children Checks and Management](#)

[4.5 Volunteers and Students](#)

[4.9 Fitness for Work](#)

[4.10 Managing Employee Underperformance and Misconduct](#)

[4.11 Prevention of Workplace Bullying, Discrimination and Harassment including Sexual Harassment](#)

[7.5 Governance and Management](#)

[7.6 Privacy and Confidentiality of Records](#)

[7.12 Workplace Health and Safety](#)

Policy 4.6 Code of Conduct		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V2-03.2025 – Added additional information to policy statement, additional procedures relevant to Conflict of Interest and Breaches of Conduct, added reference to Statement of Shared commitment.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced key tasks and responsibilities, enhanced procedures, additional points in code of conduct, additional regulatory context and guidance to align with child safe standards		
V4-04.2026 - enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, added procedures relevant to Inappropriate conduct, added references to National Law		

4.7 Employee Development and Performance Review

Policy Statement

The Service is committed to delivering quality education and care through providing supportive management to continually develop the performance and practice of its educators. Ongoing and collaborative evaluation of employee's performance will support planning that is focused on building upon the strengths and individual contributions of each employee. Employee performance will be formally and regularly reviewed and evaluated. These formal procedures will be complemented with informal support and ongoing feedback throughout the employee's engagement.

The Service also recognises its role in developing employees as part of the National Quality Standards, Quality Area 7 – Governance and Leadership. Individual plans will be created and implemented to support and effectively direct every employee's learning and development opportunities with a specific focus on child safety, wellbeing, and cultural competence.

Roles and Responsibilities

Approved Provider	• Lead the performance review and professional support of the Nominated Supervisor. • Establish procedures to ensure all employees have plans to enhance their knowledge, skills and ability relevant to their individual performance with a particular emphasis on child safe practices.
Nominated Supervisor	• Coordinate and undertake regular and ongoing supervision and developing planning of employees. • Collect and collate relevant observations and examples to provide relevant feedback to the performance of employees including their practice in child safety and cultural respect. • Ensure supportive and collaborative plans are implemented as agreed.
All Staff	• Actively participate in the performance development and review process • Complete self-evaluation of performance and collaborate with service leaders in the planning and implementation of professional development activities including those related to child safety and cultural awareness. • Complete professional development activities as agreed.

Procedures

The procedures outlined in this policy apply to further developing the performance and practice of educators (and other relevant employees). Instances of misconduct and underperformance (especially those related to a breach of the Code of Conduct, child safety standards, or cultural safety expectations) are managed through the steps outlined in the policy and procedure [4.10 Managing Employee Underperformance and Misconduct](#).

Performance Supervision Preamble

The Nominated Supervisor will be responsible for coordinating performance development or review meetings to ensure all educators (or other relevant OSHC staff) receive an opportunity to receive formal feedback on their performance and identify opportunities for improvement and professional development. It may be appropriate that other service leaders are delegated the task of facilitating performance supervision meetings.

Employees will receive information on the service's performance supervision and management practices on commencement, with this information also included in their employee handbook.

The procedures to develop and support performance should empower employees to identify their unique contributions to the service and highlight methods their practices can be enhanced. The Service will

actively seek to undertake a process that builds and empowers employees, rather than delivering a remedial or corrective approach to developing performance and skills.

Employee performance and their practices will be framed by their position description, the OSHC Professional Standards and any other relevant document or framework including the National Principles for Child Safe Organisations and the Queensland Child Safe Standards.

OSHC Professional Standards

The OSHC Professional Standards will be the preferred framework used to understand and support educator performance; however, there could be occasions where alternative performance measures are more suitable for specific individuals. The Nominated Supervisor will be responsible for determining which supervisory tools will be used in guiding performance supervision and employee development.

Likewise, the Approved Provider will determine the most appropriate performance framework to support the development of the Nominated Supervisor.

Performance Reviews and Planning

The review process will assist educators and staff develop an understanding and expectation of their role, reflect on achievements and challenges and plan goals that may assist in accomplishing performance outcomes and expectations in the future. This includes an explicit focus on how their practice contributes to a child-safe and culturally respectful environment.

A Performance Review meeting will be conducted every 12 months with each staff member to review their work performance, outline expectations and responsibilities and set professional goals. The Performance Review Form can be used to assess employee's goals and objectives, areas of strength, responsibilities and discussion as to what extent these have been met.

At all times throughout the performance review process, confidentiality and sensitivity shall be maintained to a high standard.

Initial Performance Review and Planning

1. The Nominated Supervisor will schedule a performance review meeting with the employee. Communication will be positive and time set aside should be adequate for feedback, collaboration and a discussion in identifying development opportunities.
2. The initial performance review and planning meeting will occur following completion of the probation period.
3. Prior to the performance supervision meeting, each employee will be provided with a template to assist with self-reflection. Once complete, they will forward to the Nominated Supervisor (or delegate) prior to the meeting.
4. The meeting will be facilitated in a manner that provides discussion and collaboration. The Nominated Supervisor will come prepared with relevant feedback, including observations and examples. The format of each meeting will have three broad topics:
 - a. Identifying the person's area of strength, skills, and ability ('what has gone well?')
 - b. Identifying areas of development, growth or vulnerability ('what are the opportunities for development?')
 - c. Collaborating a plan for learning, development and support ('what needs to happen?')
5. During the performance meeting the Nominated Supervisor (or delegate) is responsible for documenting the main points of the meeting and the agreed actions into a plan.
6. Action items should be specific and should outline who is responsible for coordinating specific steps. Approval for paid professional development session will need to be approved by the Approved Provider.
7. Each plan will include formal review dates. These may be quarterly, or typically at six months. However, this may be negotiated to an alternative timeline where needed.
8. The educator will have an opportunity to review the draft form and add any comments before being signed and agreed.

Interim Review

1. The interim review will be planned to occur around the midpoint of the plan's implementation.
2. At the interim review, the educator and a service leader will have the opportunity to amend any action items if there has been significant change or actions are not meeting their intended aim.

Annual Review

1. The annual review includes an evaluation of the employee's performance during the review period including an assessment against any identified goals and professional development activities and will specifically include an assessment of the employee's contribution to child safety, wellbeing, and cultural safety. It's also an opportunity to recognise and celebrate the employee's achievements and successes.
2. At the completion of the annual review period, the performance cycle recommences.

Ongoing Performance Reviews and Planning

1. Employee performance will be monitored through implementing an ongoing review process to reflect and support performance.
2. Each ongoing review will provide an opportunity to reflect and evaluate the previous learning and development opportunities, as well as current performance.
3. The ongoing supervision meetings will include:
 - Self-assessment prior to a supervision meeting
 - Feedback and work examples
 - Supervision meeting identifying of strengths, aspirations and areas for improvement; and
 - A written learning and development plan

Nominated Supervisor Review and Planning

1. The Approved Provider will appoint an appropriate delegate to lead the review and planning of the Nominated Supervisor.
2. The Nominated Supervisor's performance review will follow a similar procedure as all other employees.

Professional Development and Learning

The Service endeavours to provide adequate and relevant ongoing training and development for educators to enable them to do their job confidently and to ensure compliance with these Policies and Procedures and other requirements of the Service.

Internal Opportunities for Development

The Educational Leader and Nominated Supervisor will support the development of educators' practice through guiding professional reflection, providing access to relevant professional resources and articles, and through supervisory conversations.

Some of the engagement in professional development activities will be outlined in the employee's learning and development plan.

The Nominated Supervisor will facilitate opportunities for educators to access information for professional development and learning on a regular basis and wherever possible within the resources of the Service, specialist or expert presenters will be sought to provide training to educators on issues requiring expert knowledge and other issues relevant to:

- The operation of the Service and its Policies and Procedures, with a strong focus on child safety and wellbeing,
- Legal or other regulatory requirements; and
- Other issues of interest or benefit to educators to help them better do their job in the overall interests of the Service and the children including mandatory training on cultural safety, child protection, and responding to disclosures.

A Professional Development Plan will be completed in consultation with each educator and their Professional Development Record will be updated following the completion of any training and workshops. The Professional Development Plan forms part of the performance review process and will be discussed with the Nominated Supervisor.

External Opportunities for Development

Complementing the individual learning and development plans of employees, each educator will have fair and equitable access to relevant training opportunities based on their individual needs, position requirements, and with consideration of their professional interests.

Professional development includes opportunities to learn or further enhance skills whereas professional learning includes access to information that is required. This information may be accessible through:

- Meetings,
- Online learning and webinars,
- Training/information sessions,
- On or off-site workshops,
- Conferences, presentations or learning programs.

The Nominated Supervisor will explore opportunities for team-development including but not limited to in-service workshops or presentations. Team training needs will be identified by the Nominated Supervisor in collaboration with educators, and will address any skills, knowledge or performance gaps identified. The Nominated Supervisor will ask educators on a regular basis to contribute suggestions for training topics. Team training will include topics on cultural safety and child-safe practices at least annually.

The Nominated Supervisor will be responsible for ensuring that a written record of all professional development of educators is kept and is produced to the Approved Provider for information at least once each year.

Educators will be paid for attendance at compulsory training sessions and service team meetings, in accordance with relevant awards. The Service shall allocate funds within the budget for training and professional development for educators

Training Records

The Nominated Supervisor will be responsible for ensuring records of all professional development sessions/initiatives are maintained, including copies of certificates and attendance records.

Procurement and Approval

The Approved Provider be required to approve all professional development intentions and funding, including the service's budget for training and professional development.

The Approved Provider may delegate specifics, including the facilitator, to the Nominated Supervisor. The Nominated Supervisor will follow policy [7.9 Budgeting, Procurement and Financial Planning](#) to ensure value for money.

Educators will be paid for attendance at approved training sessions and team meetings, in accordance with the award.

Privacy and Confidentiality

All plans will be stored securely in the respective employee personnel file (refer policy [7.6 Privacy and Confidentiality of Records](#)).

Employees will be provided with a copy of their finalised plans.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations:**
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**

- QA4 – Staffing arrangements
- QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[4.6 Code of Conduct](#)

[4.8 Employee Qualifications – Monitoring Progress](#)

[4.10 Managing Employee Underperformance and Misconduct.](#)

[4.11 Prevention of Workplace Bullying, Discrimination and Harassment including Sexual Harassment](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.5 Governance and Management](#)

[7.6 Privacy and Confidentiality of Records](#)

[7.15 Self-Assessment and Quality Improvement](#)

Policy 4.7 Employee Development and Performance Review		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V2-06.2024 – Additional procedures relevant to professional development and learning		
V2-03.2025 – No updates		
V3-10.2025 – Policy renamed from employee performance review and support, enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional procedures relevant to annual review, additional regulatory context and guidance to align with child safe standards		
V4-04.2026 – added references to OSHC Professional Standards, enhanced procedures for Initial Performance Review and Planning		

4.8 Employee Qualifications – Monitoring Progress

Policy Statement

The Service seeks to ensure that all employees enrolled and studying towards relevant qualifications are monitored and supported as they progress through their studies. This ensures that the service strives towards providing a suitably qualified level of educators and maintain compliance with Education and Care Service National Regulations (10 & 299A) for rostering of employees working directly with children.

Roles and Responsibilities

Approved Provider	- Establish processes to monitor and record the progress of employees' qualifications. - Support employees to make satisfactory progress and attain their qualification within the required timeframe.
Nominated Supervisor	- Coordinate the recording of progress of employees and maintenance of documented evidence. - Liaise with employees and the Approved Provider where issues relating to the progress of a qualification arises.
All Staff	Submit relevant evidence of qualification progress to the Nominated Supervisor.

Procedures

Employee Qualification and Study

Employee records gathered during recruitment and induction will document the employee's current qualification enrolment.

All employees shall provide a certified copy of their certificate of enrolment in the approved course or other relevant documentation providing such evidence during their initial probation period or as otherwise required by legislation.

This record shall be attached to a study monitoring form and maintained in the employee's personnel file held at the service.

An employee's suitability and employability may be dependent on their continual progress (*actively working*) towards completing their relevant qualification.

Employees are to notify the Nominated Supervisor when there has been a change in their study/qualification commitment or status. The Nominated Supervisor will notify the Approved Provider of any significant issues or relevant changes.

Failure to reasonable notify the Nominated Supervisor will be treated seriously and may result in disciplinary action (refer policy [4.10 Managing Employee Underperformance and Misconduct](#)).

Evidencing Progress

All employees will be required to evidence the progression of their study and work towards their qualification. Typically, this will be through providing a copy of the transcript at the conclusion of each semester (every six months).

Where this is not suitable, alternative agreements will be arranged with the Nominated Supervisor before the anticipated date that qualification progress would be supplied.

Addressing changes in Qualification Progress

Employees who are unable to fulfil their role due to change in their qualification status through no longer being classed as 'actively working towards' (*E&CS National Regulation 10*), may be subject to a review of their employment with the service (refer policy [4.10 Managing Employee Underperformance and Misconduct](#)).

Records

All records and evidence supplied to the service will be stored and maintained securely in the respective employee file (refer policy [7.6 Privacy and Confidentiality of Records](#)).

Where an Educator has achieved a qualification, the Approved Provider is responsible for updating this information on the *National Early Childhood Worker Register* within 14 days of becoming aware of any change to an Educator's personal information.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations:**
 - R.10 Meaning of actively working towards a qualification
 - R.154A National Early Childhood Worker Register
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.299 General qualification requirements for educators—children over preschool age
- **National Quality Standard:**
 - QA4 – Staffing arrangements
 - QA7 – Governance and leadership

Related Policies and Procedures

[2.2 Supervision and Educator Ratios](#)

[4.7 Employee Development and Performance Review](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.5 Governance and Management](#)

[7.6 Privacy and Confidentiality of Records](#)

[7.15 Self-Assessment and Quality Improvement](#)

Policy 4.8 Employee Qualifications – Monitoring Progress		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V1-03.2025 – No updates		
V2-10.2025 – Enhanced roles and responsibilities, enhanced procedures		
V2-04.2026 – minor change to procedures relating to qualification records to reference the National Early Childhood Worker Register, added reference to National Regulations.		

4.9 Fitness for Work

Policy Statement

The Service is committed to upholding the safety and wellbeing of all children, community members and employees. To ensure the highest standards of health, safety and compliance, the service requires all employees to be fit and competent to fulfil their duties. An employee's fitness for work is a fundamental aspect of their duty of care to children, and it is a non-negotiable requirement for maintaining a child-safe and culturally respectful environment.

The Approved Provider recognises there are common elements that can impact an employee's capacity to safely attend work, including being affected by:

- Fatigue, which may impair judgment and the ability to respond to children's needs.
- Alcohol and/or other substance(drug) use, which is strictly prohibited while on duty to ensure children are protected from harm.
- Medical fitness to ensure the employee can physically and mentally perform their role safely.
- Mental health and wellbeing, acknowledging that employees require support to be present and effective in their role.

All employees are required to report to the Nominated Supervisor if they are not in a state (sufficient level of fitness) to attend work. Any employees who present as unfit for work will be stood down immediately, with management action taken to identify the concerns. The Nominated Supervisor will be responsible for ensuring that the employee is fit to travel home or provide alternative arrangements.

Roles and Responsibilities

Approved Provider	• Ensure established expectations and processes are in place to ensure employees are fit for duty. • Manage and oversee concern about employee presentation and suspension from work.
Nominated Supervisor	• Be responsible for fairly monitoring and assessing the fitness for work of employees, with a primary focus on child safety and wellbeing. • Immediately stand down any employee suspected to be under the influence of alcohol, other drugs, or where it is not safe for them to continue their role and immediately remove them from contact with children.
All Staff	• Ensuring they are fit to perform work and do not present for work in an unfit capacity including under the effects of alcohol, other drugs, or fatigue. • Immediately notifying the Nominated Supervisors of concerns of their fitness for work. • Notifying the Nominated Supervisors, or Responsible Person of suspicions colleagues or other individuals are believed to be unfit for work, recognising this as a key responsibility in upholding child safety.

Procedures

Fatigue

The Nominated Supervisor is responsible for ensuring roster cycles are monitored and reviewed to address the potential for fatigue, especially among employees engaged in split shifts and/or potentially hazardous activities. Provision will be made within all shifts for appropriate rest and meal breaks in accordance with the relevant award requirements.

Where an employee is not fit to present to work due to fatigue, they are required to notify the Nominated Supervisor or Responsible Person immediately for the management of the roster. Employees should not present to work where they believe they do not have the capacity to fulfil their duties or to adequately supervise children.

The Nominated Supervisor will take all practical steps to assess the environment to minimise the impact of fatigue including undertaking risk assessments and will provide appropriate information to employees to ensure their awareness and ability for self-management.

Alcohol and Substances

An employee must not be under the influence of alcohol or any other substance while engaged in their duty. The Approved Provider expects that all employees will not present themselves for work after consuming alcohol or other influencing substance (illicit or not).

Where the employee cannot fulfil their role because they have consumed alcohol, they are to immediately notify the Nominated Supervisor, Responsible Person, or an executive member of the Approved Provider. The relevant person will follow the roster contingency to find a replacement staff member. Under no circumstances is an employee who has consumed alcohol or influencing substances present for work.

Suspicion of Employee Being Under the Influence

Any employee being suspicious of a colleague (or relevant personnel) being under the influence of alcohol or other substance should report this concern to the Nominated Supervisor or Responsible Person immediately. This is a mandatory reporting requirement for the safety of children.

Indications of a person being under the influence include:

- Slurred or impaired speech,
- Being aggressive in manner,
- Staggered, jerky movements, could seem uncoordinated,
- Heavy eyes and/or flushed face; and/or
- A dull, tired appearance.

The Nominated Supervisor or Responsible Person will assess the presentation of the employee (or relevant person). Where the Nominated Supervisor or Responsible Person holds a reasonable suspicion an employee is under the influence they are to immediately stand down the employee and ensure they have no contact with children. The Approved Provider must then be notified.

The Approved Provider will determine if the employee should be directed to take an oral or urine test for alcohol or substance at a medical centre. Costs of this test will belong to the Approved Provider.

If an employee is directed to complete the drug or alcohol test and refuses to do so, the Approved Provider will view this as a failure to follow a reasonable and lawful instruction, which may result in disciplinary action up to and including termination of employment.

Prescription Medication

An employee must ensure that any drugs prescribed by a medical practitioner must be used in accordance with medical advice. Any non-prescription drugs must be used in accordance with manufacturers' recommendations. If an employee is taking prescription or non-prescription drugs, which could cause drowsiness or otherwise affect their fitness for work, they must advise the Nominated Supervisor so that their ability to work safely can be monitored. If necessary, medical opinion may be obtained from the individual's Doctor. This is essential to ensure the employee's capacity to supervise and care for children is not impaired.

Inherent Physical Requirements

The Nominated Supervisor is responsible for ensuring that all employees are fit and able to perform the inherent requirements of their position and may consider light duties and/or stand down any employee who is not physically capable of performing their duties.

To be considered physically capable of performing their duties, the employee must be able to move about freely, particularly in the case of emergency or risk of harm to children. As per the position description, the Sherwood State School OSHC Policies and Procedures – V5-04.2026

employee must be able to interact with the children and actively contribute to the activities, experiences and routines of the service. This may include but not be limited to physical activities such as walking, running, standing, crouching or kneeling.

If a decision to stand down an employee due to them not being considered physically fit is made by the Nominated Supervisor they are to immediately notify a member of the Approved Provider (President, Secretary or Treasurer) stating the reasons why the employee has been stood down.

Any employees who have been stood down must not return to work until they have medical clearance (i.e. a Doctor's certificate) stating that they are fit to work.

Employees may be requested to undertake an independent medical examination to verify that they are fit for work as expected of them in their role. This process will be non-discriminatory and implemented by management without bias or prejudice.

Illness

Employees who are unwell should not attend work and should notify the Nominated Supervisor at their earliest convenience that they are unfit for work. Medical certificates may be required in accordance with Service requirements.

Employees may be requested to undertake a health check or medical to verify that they are fit for work as expected of them in their role. This process will be non-discriminatory and implemented without bias or prejudice.

Employees who become unwell whilst on the job shall report immediately to their supervisor and may be relieved from duties.

Employees who have been diagnosed with or suspect that their illness is due to infectious disease shall follow the guidelines as specified by the service in regard to exclusion periods to protect the health and wellbeing of children and other staff.

Pregnancy

The process and steps required to ensure an employee's health and wellbeing during pregnancy will vary. For many employees, variations to duties, equipment, and the work environment may not be necessary, and usual duties may be performed for the duration of the employee's pregnancy.

Employees who are pregnant are encouraged to disclose their pregnancy in a timely manner to ensure that the employer can support their health, safety and well-being in the workplace.

It is the responsibility of the employee who is pregnant to raise and discuss any workplace concerns and/or issues with the Approved Provider and/or Nominated Supervisor. However, there may be instances where the manager or Nominated Supervisor is required to exercise their duty of care to ensure the safety, protection and wellbeing of their employees.

The potential risk of injury or ill health will be discussed with employees who are pregnant in accordance with policy [2.8 Hygiene, Health and Wellbeing Practices](#). Where there is an identifiable risk associated with a pregnant employee's work, the Approved Provider and/or Nominated Supervisor will consult with the employee to examine how the work can be modified to eliminate or minimise the risk.

The employee is requested to immediately advise the Approved Provider and/or Nominated Supervisor if they believe there is a hazard or potential risk to the pregnancy in the workplace or if health and safety issues are experienced or have been foreseen that may affect the pregnancy. The employee may be required to provide supporting medical evidence in relation to any health issues or restrictions identified that may impact their ability to perform their duties.

Pregnant employees are requested to provide the required notice of intended leave in writing to the Approved Provider and/or Nominated Supervisor to ensure continuity of staffing requirements can be maintained. Additionally, an educator must inform the Approved Provider if they intend to take up unpaid parental leave in order for backfill arrangements to be organised.

The Approved Provider will ensure pregnant employees are made aware of the relevant health risks when working with children including but not limited to:

- exposure to specific infectious diseases or conditions that can have an adverse impact on pregnancy, including Cytomegalovirus (CMV), Hand, foot & mouth disease, Human parvovirus B19 (erythema infectiosum, fifth disease), Listeriosis, Rubella (German measles), Measles, Hepatitis B, HIV (Human Immunodeficiency Virus), AIDS (Acquired Immunodeficiency Syndrome), Pertussis (Whooping cough), Toxoplasmosis and Varicella (chickenpox),
- stress and burnout,
- swollen feet and varicose veins,
- heat stress.

The Approved Provider and/or Nominated Supervisor will:

- be as flexible as possible within the constraints of the workplace, to ensure the specific needs of pregnant employees are considered and options to address their needs implemented wherever possible.,
- implement strategies which help reduce physical stress for pregnant employees, such as: do less physical tasks such as raking, sweeping, lifting etc.
- ensure that all employees are familiar with infection control policies and procedures and actively adhere to these at all times as this is a critical component of protecting both the employee and the children in care.

Independent Medical Assessment

In situations where there is concern regarding an employee's fitness to return to work, the Service may request a medical certificate or other relevant documentation from a physician or medical practitioner to verify the employee's ability to safely resume their duties. This documentation will be used to ensure that the employee can perform their work safely without posing any risks to themselves, colleagues, or children under care.

In the event of repeated withdrawals from shifts due to fitness for work concerns, the Service reserves the right to request an independent medical examination from a qualified medical practitioner, physician or medical specialist at the expense of the Service. This assessment will aim to determine the employee's overall wellbeing and long-term fitness for work. Such documentation is necessary to ensure the employee's continued ability to perform their duties safely and effectively.

Confidentiality

Confidentiality is vital in promoting the effectiveness of this policy and all reasonable efforts, consistent with safety, legal requirements and common sense, must be made to maintain an individual's privacy.

Information relating to an employees' fitness for work must be transmitted, used and stored in a confidential manner in accordance with policy [7.6 Privacy and Confidentiality of Records](#).

The disclosure of confidential information may be required to those persons who have a legitimate 'need to know'. This disclosure will be only to persons who have a responsibility for ensuring the employees' safety and performance as well as the safety of children.

Disclosure of information will be limited to the information necessary to address the situation.

Approved Provider will inform the employee as to:-

- The reason or need for disclosure
- To whom the disclosure will or has been made
- The extent of information that will or has been disclosed.

Breaches of this Policy

Failure to disclose concerns regarding fitness to work may result in disciplinary action due to the safety implications it poses for both the individual and others within the workplace. Ensuring fitness for work is

crucial to maintaining a safe and effective environment for all staff and children in care. Any breach of this policy that puts a child's safety or wellbeing at risk will be considered a serious matter.

The Approved Provider will take disciplinary action as per procedures relating to serious misconduct within policy [4.10 Managing Employee Underperformance and Misconduct](#). The appropriate disciplinary action will depend on the individual circumstances of each matter.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations:**
 - R.82 Environment to be free from tobacco, vaping devices, vaping substances, drugs and alcohol
 - R.83 Staff members and family day care educators not to be affected by alcohol or drugs
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA4 – Staffing arrangements
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Work Health and Safety Act 2011](#)
- [Industrial Relations Act 2016 \(Qld\)](#)
- [Queensland Employment Standards](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[2.7 Infectious Diseases](#)

[4.3 Working with Children Checks and Management](#)

[4.5 Volunteers and Students](#)

[4.6 Code of Conduct](#)

[4.10 Managing Employee Underperformance and Misconduct](#)

[4.11 Prevention of Workplace Bullying, Discrimination and Harassment including Sexual Harassment](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.5 Governance and Management](#)

[7.6 Privacy and Confidentiality of Records](#)

[7.12 Workplace Health and Safety](#)

Policy 4.9 Fitness for Work		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V2-06.2024 – Additional procedures relevant to physical ability, confidentiality, Illness and Disciplinary procedures		
V3-03.2025 – Added additional procedures relevant to Pregnancy		

V4-10.2025 – Policy renamed from fit for work, enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional procedures relevant to employee assistance program, additional procedures relevant to breaches of policy, additional regulatory context and guidance to align with P&C legislative requirements and child safe standards		
V4-04.2026 – No updates		

4.10 Managing Employee Underperformance and Misconduct

Policy Statement

The Approved Provider acknowledges the need to adequately manage employees to ensure quality care and high standards of safety for children. When responding to instances of employee underperformance or misconduct, Executive members of the Approved Provider and respective OSHC service leaders will respond to performance issues promptly, and in a manner that supports the principles of fairness, natural justice and is compliant with legislative and relevant industrial instruments. The Service recognises performance management and/or disciplinary action may be undertaken by the Approved Provider to address underperformance and misconduct issues.

This policy is a critical component of the Service's commitment to the Queensland Child Safe Standards. It ensures that any behaviour that compromises a child's safety, wellbeing, or cultural safety is identified, addressed, and rectified immediately and transparently.

Reasons for underperformance can include, but not limited to:

- Unclear expectations or behavioural standards.
- Interpersonal differences and conflict.
- A mismatch between the capability of the employee and the job they are required to undertake.
- Poor motivation or low morale in the workplace.
- Personal issues, including stress, physical or mental health problems.
- Cultural misunderstanding or lack of cultural awareness.
- Workplace bullying.

Not every underperformance issue requires a structured process; informal feedback, support and guidance can promptly address issues relating to the performance of employees. The Approved Provider and relevant service leaders will encourage regular, ongoing feedback and open discussion in an understanding and supportive environment to address any performance issues identified.

The Service recognises there is a need for formal mechanisms to manage performance and misconduct issues, including workplace investigations and disciplinary processes. In all instances, a fair and just process will be provided to employees to manage a resolution with the safety of children as the paramount consideration.

Roles and Responsibilities

Approved Provider	• Establish fair and reasonable procedures for managing underperformance and misconduct, ensuring these procedures are fully compliant with child safety legislation and standards. • Undertake fair and lawful actions in response to employee performance and conduct. • Ensure adequately skilled and capable persons are delegated to handle and investigate instances of underperformance and misconduct, particularly allegations related to child harm or risk. • Ensure disciplinary actions are fair and reasonable and proportionate to the risk posed to children.
Nominated Supervisor /Manager	• Respond to underperformance or behaviour concerns of employees in a timely and professional manner. • Report significant concerns to the Approved Provider for management and response, especially any concerns that may impact a child's safety or wellbeing.
All Staff	• Participate in performance discussions and meetings • Immediately report any concerns about a colleague's conduct or performance that may compromise child safety.

Procedures

Employee Underperformance

Underperformance or poor performance can be exhibited in the following ways:

- unsatisfactory work performance - a failure to perform the duties of the position or to perform them to the standard required
- non-compliance with workplace policies, rules or procedures, including child safety and cultural safety protocols.
- unacceptable behaviour in the workplace
- disruptive or negative behaviour that impacts on co-workers.

Underperformance that poses a direct or indirect risk to child safety, wellbeing, or cultural safety will be treated with the utmost seriousness. This may warrant a more immediate formal response rather than the informal feedback process.

Underperformance and **misconduct** are separate and distinct management concepts. Misconduct includes general misconduct and serious misconduct. General misconduct is behaviour that is inconsistent with the employee obligations or duties, a breach of company policy or procedure, or generally unacceptable or improper behaviour. Serious misconduct is a very serious behaviour (including behaviours such as theft or assault), which may warrant summary dismissal or disciplinary action. Whereas underperformance requires counselling and potentially performance management planning to support improvement..

The Service's counselling and performance procedures will have three distinct (but not necessarily sequential) components:

- Informal feedback and counselling
- Formal feedback and counselling; and
- Formal performance management through a Performance Improvement Plan.

Responding to Underperformance

Informal Feedback and Counselling

Understanding the reasons for underperformance through informal counselling and feedback will be the typical first step. Where an employee can be gently guided to correct any performance issues it the preferred option. This approach also allows the manager to explore the potential causes for the area/s of underperformance through open dialogue with the employee.

The Nominated Supervisor is encouraged to raise concerns directly with the employee as they arise. It should be done promptly through direct feedback as soon as the issue is recognised/occurs. Informal feedback can also be provided during regular 1:1 Meetings which occur between the manager and the employee.

Formal Feedback and Counselling

If the performance concerns have not improved through informal feedback and counselling, a more structured approach should be taken which includes documenting the concerns and sharing this information with the employee for transparency and consistency.

The Nominated Supervisor will continue to provide feedback to the employee, with informal feedback followed up in writing. This can be a brief email summarising what was discussed and what improvement is expected.

Meeting notes from 1:1 supervision meetings will need to be recorded and shared with the employee. This should include the following:

- a record of the performance issue/s raised
- agreed actions or expectations, including timeframes
- any training, support or resource requirements discussed.

This documentation demonstrates that the employee has been provided with opportunities to improve their performance prior to formal performance management action being taken. Using this approach ensures

that there are no surprises for the employee should their performance not improve to the required standard and further action is required.

Formal Performance Management

Where underperformance continues or it has been determined the employee has engaged in misconduct, the Approved Provider will establish a Performance Improvement Plan (PIP) to support the employee to address the issues that have been identified. This includes any underperformance related to a failure to meet child safety, wellbeing, or cultural safety expectations.

The PIP will include:

- a. The desired **outcomes** for the employee's behaviour.
- b. The **strategies** the employee can use to reach the desired outcome.
- c. The **support** that can be accessed to assist, including specific training on child protection, cultural awareness, or trauma-informed practice.
- d. An outline of **responsibilities** for the employee and employer.

The PIP will outline timeframes for the improvement in behaviour to occur. All PIPs are strictly confidential and will be supported by ongoing counselling by the employer to provide relevant feedback and support.

The employee will be notified first verbally, and then in writing of the intention to meet to discuss their performance and the implementation of the PIP. Written communication with the employee should also include:

- Time, date and location of the meeting,
- The purpose of the meeting and matter/s that will be discussed (i.e. specific details of the alleged underperformance/ conduct),
- Notification of who will be in attendance; and
- The opportunity for the employee to invite a support person.

The employee should be given sufficient time to prepare for the meeting (at least 48 hours' notice). However, time frames should not exceed more than five business days unless there are extenuating circumstances and where parties agree.

At the meeting, the relevant manager/employer (as agreed by the Approved Provider) and the employee will review the performance concerns and steps taken to date, outline the specific areas requiring improvement and present the draft PIP. The employee will be provided with a copy of the draft PIP and given the opportunity to provide input prior to the PIP being finalised.

This plan should be agreed to by the employer and employee. The document will be stored confidentially (refer policy [7.6 Privacy and Confidentiality of Records](#)).

Where there are strong disputes over the matters being raised, it may be appropriate to escalate to a workplace investigation (refer below) to establish the facts.

All persons involved with the counselling proceeding must maintain the confidentiality of the matters.

Employee Misconduct

It is generally held that the definition of 'misconduct' involves something more than inappropriate conduct, negligence or error of judgement/an innocent mistake. Misconduct would typically imply an act done wilfully with a wrong intention. Example of misconduct could include:

- Using abusive, harassing, insulting or culturally insensitive language, especially in the presence of children.
- Wilfully contravening workplace policies,
- Excessive and ongoing lateness,
- Knowingly disclosing confidential information,
- Misuse of workplace-owned equipment or resources.

Serious misconduct is more clearly defined. It is conduct that is wilful and deliberate, and that is inconsistent with the continuation of the employment relationship. It is also conduct that causes serious and imminent risk to the health and safety of a person or to the reputation, viability or profitability of the

employer's business. In the context of the Service, any conduct that constitutes a serious and imminent risk to a child's safety and wellbeing is considered serious misconduct. Serious misconduct includes:

- Theft, fraud, assault, sexual harassment, and any form of abuse or neglect of a child.
- intoxication at work; and
- the refusal to carry out lawful and reasonable instruction consistent with the employment contract.

Responding to Misconduct Allegations

All allegations of misconduct will be reported to the Approved Provider who will delegate a relevant person to manage the investigation, including the appointment of an investigator. The Approved Provider reserves the right to appoint an external party to undertake support and complete the investigation.

The Approved Provider (or delegate) will take steps to understand the allegations, where these are unclear, including through contacting potential witnesses to the alleged events.

In cases involving alleged harm to a child, a mandatory notification to the relevant child protection agencies will be made immediately, as per policy [2.14 Child Protection and Mandatory Reporting](#).

The Approved Provider (or delegate) will notify the employee of the allegations in writing and will request the employee to attend a meeting to provide a response to the allegation/s. Alternatively, the respondent may be asked to provide a written response to the allegation/s prior to the meeting occurring. The written communication with the employee should also include:

- Time, date and location of misconduct meeting,
- The matter/s that will be discussed (i.e. specific details of the alleged misconduct),
- Notification that the meeting will be their opportunity to respond,
- Notification of who will be in attendance; and
- The opportunity for the employee to invite a support person.

The employee should be given sufficient time to prepare for the meeting (at least 48 hours' notice). The amount of notice given to employees to prepare will depend on the severity of the allegations. However, time frames should not exceed more than five business days unless there are extenuating circumstances.

The purpose of a **workplace investigation** is to establish the facts and obtain accurate information in relation to a complaint of misconduct and then form a judgement to what happened. The investigation should determine if allegations actually occurred and identify any mitigating circumstances of the alleged incident/s.

Workplace Investigation

The Approved Provider must ensure the person conducting the investigation is not associated or involved in the allegations. An additional person to support the interview through note-taking may also be requested. This person should also not have had any involvement or association.

The standard of proof used in workplace investigations is the balance of probabilities, which means that the evidence indicates that the event more likely occurred than it did not.

A workplace investigation typically involves the following steps.

1. The Investigator should prepare by gathering all available evidence of the allegations being presented. Additionally, copies of relevant documents (policies, position descriptions, employment contract, and supporting evidence) should be collated.
2. A record of the interview will be maintained by the appointed investigator or note-taker. Alternatively, the interview may be recorded, with a copy of the transcript given to the respondent.
3. The meeting will begin by confirming the roles of participants (in particular, the duties and scope of the support person) and the agenda.
4. The employee will be provided with an opportunity to respond to the allegations presented to them. The employee should be provided with sufficient details of the allegations to adequately and fairly respond. The Investigator may ask questions to clarify and draw out relevant information.

5. The employee may identify if relevant, additional witnesses that can be interviewed to provide additional information or evidence.
6. Once the employee has provided their response to allegations, the meeting will conclude.
7. Where additional information is required/available or specific witnesses have been identified, the Investigator will coordinate the collection of this evidence
8. Witness statement/s should be collected by the Investigator in a formal manner. Witnesses may be interviewed and the interview may be recorded, with a copy of the transcript given to the witness. A witness requested to give a statement may invite a support person to the interview. Once the witness has provided a statement, the witness will be asked to sign a copy of the statement. All parties must maintain confidentiality in the investigation. All witness statements will be handled and stored confidentially (refer policy [7.6 Privacy and Confidentiality of Records](#)).
9. Where new and relevant information has been obtained, the employee must be provided with an additional opportunity to respond (following items 1-5 above).
10. The Investigator must be satisfied that they have all the relevant evidence and information to make findings. This includes ensuring that the employee has responded to all allegations against them.
11. Once all relevant information has been collected, the Investigator will make findings based on the balance of probabilities. Therefore, each allegation must conclude one of the following:
 - a. **Substantiated** (behaviour/allegations found to have occurred)
 - b. **Unsubstantiated** (there is not sufficient evidence to conclude the behaviour/allegation had occurred)
12. The investigator will outline the investigation and their findings in an Investigation Report that will be submitted to the Approved Provider. The report will remain confidential (refer policy [7.6 Privacy and Confidentiality of Records](#))
13. The findings of the investigation will be presented to the employee in an outcome meeting. The employee will be offered an opportunity for a support person at this meeting. The notification of this meeting will be made in writing.
14. Where the investigation has substantiated allegations, the employer (Approved Provider) will consider the appropriate outcome, and if relevant, disciplinary action/s. The primary factor in determining the outcome will be the severity of the risk posed to a child's safety, wellbeing, or cultural safety.

Disciplinary Actions

The term 'disciplinary action' means the actions taken by an employer in response to unacceptable behaviour of performance misconduct. The purpose of *disciplinary action* is to address and correct performance and/or conduct problems in a fair, constructive and proportionate manner.

Before disciplinary actions are taken, the Approved Provider should consider mitigating circumstances and if appropriate opportunity to improve performance has been taken. The Approved Provider should ensure their actions are fair and reasonable in the circumstances. Disciplinary action can range from informal (eg. verbal warning, counselling, training) to formal (eg. suspension, written warning, demotion, termination of employment).

Any disciplinary action undertaken by the Approved Provider will be communicated to the employee in writing.

Written Warnings

The purpose of a written warning is to confirm and address a conduct or performance issue with the employee and to make clear that further disciplinary action may be taken. A written warning may be given to an employee when:

- The employee has previously been through the formal counselling process and has not met the required standards or expectations; or
- The employee's performance or misconduct is of a serious nature and requires immediate action.

Written warnings must also detail the support (including the Employee Assistance Program) and/or training to be provided to the employee as well as the expected timeframes for review of the identified issue/s if applicable.

Termination of Employment

Where the Approved Provider is considering terminating an employee's employment due to the seriousness of the performance or conduct matter, the employee will be issued with a Show Cause Notice and may be invited to a Show Cause Meeting. The purpose of the notice is to provide procedural fairness and ask the employee to provide a rationale (i.e. mitigating factors) as to why their employment should not be terminated.

Note that any termination should be considered as a final resort. The Approved Provider should ensure the action is fair and reasonable in the circumstances.

Summary dismissal (instance dismissal) is the most severe form of termination of employment. *Summary dismissal* is implemented without any notice or payment in lieu of a period of notice (immediate effect). Summary dismissal can only be undertaken when **serious misconduct** by the employee has been substantiated, especially in cases where the employee's conduct has caused harm or posed a serious risk to a child.

Show Cause Meeting

1. Notification for an employee to attend a show cause meeting will be made in writing, outlining:
 - a. Time, date and location of meeting,
 - b. The matter/s that will be discussed (i.e. outlining the intention to terminate their employment),
 - c. Notification that the meeting will be their opportunity to respond,
 - d. Notification of who will be in attendance; and
 - e. The opportunity for the employee to invite a support person.
3. At the meeting, the employee will be provided with an opportunity to respond to the intention to terminate their employment.
4. Once the employee has stated their case, the meeting may end and the employee will be notified by the Approved Provider within 48 hours of the decision.

In considering termination, the Approved Provider needs to ensure the employee is:

- Not being unfairly dismissed.
- Is given the right notice of termination.
- Is given the right final pay.

Termination Entitlements

Except in the case of summary dismissal, employees who are terminated will be given notice as outlined in the Award (or relevant agreement) and their final pay will include payment of any accrued leave and/or entitlements (where applicable).

A statement of service can be provided, but only on the request of the terminated employee.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations:**
 - R.82 Environment to be free from tobacco, vaping devices, vaping substances, drugs and alcohol
 - R.83 Staff members and family day care educators not to be affected by alcohol or drugs
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA4 – Staffing arrangements
 - QA7 – Governance and Leadership

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Industrial Relations Act 2016 \(Qld\)](#)
- [Anti-Discrimination Act 1991 \(Qld\)](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[2.1 Providing a Child Safe Environment](#)

[2.2 Supervision and Educator Ratios](#)

[2.14 Child Protection and Mandatory Reporting](#)

[4.3 Working with Children Checks and Management](#)

[4.6 Code of Conduct](#)

[4.9 Fitness for Work](#)

[4.11 Prevention of Workplace Bullying, Discrimination and Harassment including Sexual Harassment](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.5 Governance and Management](#)

[7.6 Privacy and Confidentiality of Records](#)

[7.12 Workplace Health and Safety](#)

Policy 4.10 Managing Employee Underperformance and Misconduct		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V1-03.2025 – No updates		
V2-10.2025 – Policy renamed from Employee Underperformance, Misconduct and Disciplinary Actions, enhanced policy statement, added staff and enhanced roles and responsibilities, enhanced procedures, additional procedures relevant to formal feedback and counselling, additional procedures relevant to show cause meeting, additional regulatory context and guidance to align with P&C legislative requirements and child safe standards		
V2-04.2026 – No updates		

4.11 Prevention of Workplace Bullying, Discrimination and Harassment including Sexual Harassment

Policy Statement

All employees have the right to work in a place free from discrimination, harassment and bullying. The Service is committed to establishing a culture where all employees are valued, respected and appreciated by their colleagues, supervisors and employers. Workplace bullying, discrimination and harassment can have a significant detrimental impact to the ongoing health and wellbeing of employees.

Workplace bullying and harassment are a psychosocial hazard that have the potential to harm a person, and it also creates a psychological risk as there is a possibility that a person may be harmed if exposed to it. The following guidelines will be implemented by the Service to ensure effective reporting and management of allegations of bullying and harassment in the workplace, therefore reducing the risk of it becoming an acceptable workplace behaviour.

The Approved Provider is an Equal Employment Opportunity employer. At all stages of the employment relationship (recruitment and selection, terms and conditions of work, training and professional development opportunities, promotion and transfer, redundancy and termination) employees will be treated on their merits and according to how well they perform their duties.

The Service believes that all employees should be able to work in an environment free from bullying, discrimination, victimisation, harassment, and vilification. As such, the Service has a zero tolerance towards these behaviours. We consider these behaviours unacceptable, and they will not be tolerated.

Roles and Responsibilities

Approved Provider	• Ensure employees are provided with initial and ongoing training, guidance and instructions on suitable conduct for interactions with colleagues or relevant others. • Monitor and respond to instances of inappropriate conduct. • Oversee the investigation and response to allegations of harassment, discrimination or bullying. • Communication practices and policies are reviewed frequently to ensure best practice
Nominated Supervisor	• Collaborate with the Approved Provider in responding to allegations of harassment, discrimination or bullying. • Support employees to access mechanisms to report concerning conduct. • Provide training, guidance and instructions to employees about appropriate interactions with colleagues and others. • Restrict contact to staff or educators outside of working hours, unless the contact is deemed reasonable
All Staff	• Ensure interactions with colleagues and others is respectful and free from harassment, victimisation, discrimination or bullying. • Report any instances of concerning conduct to Nominated Supervisor (or relevant other persons with management responsibilities). • Discuss any contact outside of working hours that they consider as unreasonable or disruptive with management

Procedures

Workplace bullying and harassment, including sexual harassment shall not be tolerated or accepted by any employee or member management of the Service. Therefore this policy and procedure is not limited to the workplace or working hours and will include all work related events including but not limited to:

- Team meetings,

- Family events organised by the service,
- Celebratory functions,
- Other events organised by the service in public or private locations.

This policy also relates to, but is not limited by the following types of communication:

- Verbal communication, either over the telephone or in person in the workplace, and outside of it,
- Written communication including letters, notes, minutes of meetings etc.,
- Internal and external communication including emails and/or text messages.

Workplace bullying is repeated, and unreasonable behaviour directed towards a worker or a group of workers that creates a risk to health and safety.

Workplace Bullying

Unreasonable behaviour means behaviour that a reasonable person, having considered the circumstances, would see as unreasonable, including behaviour that is victimising, humiliating, intimidating or threatening. Examples of behaviour, whether intentional or unintentional, that may be workplace bullying if they are repeated, unreasonable and create a risk to health and safety include but are not limited to:

- abusive, insulting or offensive language or comments,
- aggressive and intimidating conduct,
- belittling or humiliating comments,
- victimisation (treated unfavourably because they have made or supported a complaint),
- practical jokes or initiation,
- unjustified criticism or complaints,
- deliberately excluding someone from work-related activities,
- withholding information that is vital for effective work performance,
- setting unreasonable timelines or constantly changing deadlines,
- setting tasks that are unreasonably below or beyond a person's skill level,
- denying access to information, supervision, consultation or resources to the detriment of the worker,
- spreading misinformation, malicious rumours or submitting vexatious complaints/allegations,
- changing work arrangements such as rosters and leave to deliberately inconvenience a particular worker or workers,
- displaying negative or dismissive non-verbal communication, such as eye-rolling, sarcastic gestures, or other forms of body language intended to undermine or belittle others.
- engaging in the deliberate withholding of communication or interaction, such as giving the "silent treatment" or ignoring an individual in a way that creates an isolating or hostile environment.
- engaging in inappropriate or offensive discussions about a colleague, including complaining or gossiping to other staff members in a manner that is uncomfortable, disrespectful, or damaging to the individual's reputation.

If the behaviour involves violence, for example, physical assault or the threat of physical assault, ***it should be reported to the police.***

Unreasonable behaviour may involve unlawful discrimination or sexual harassment which, by itself, is not bullying. This behaviour (discrimination and sexual harassment) does not need to be repeated to be unlawful.

Behaviour that does not Constitute Workplace Bullying

A single incident of unreasonable behaviour is not workplace bullying, however it may be repeated or escalate and so should not be ignored.

The Approved Provider may take reasonable management action to effectively direct and control the way work is carried out. It is reasonable for managers and supervisors to allocate work and give feedback on a worker's performance. These actions are not workplace bullying if they are carried out in a lawful and reasonable way, taking the particular circumstances into account.

Examples of reasonable management action taken in a reasonable way include:

- setting realistic and achievable performance goals, standards and deadlines ,
- fair and appropriate rostering and allocation of working hours,
- transferring a worker to another area or role for operational reasons,
- deciding not to select a worker for a promotion where a fair and transparent process is followed,
- informing a worker about unsatisfactory work performance in an honest, fair and constructive way,
- informing a worker about unreasonable behaviour in an objective and confidential way,
- implementing organisational changes or restructuring,
- taking disciplinary action, including suspension or terminating employment where appropriate or justified in the circumstances.

Unlawful Discrimination

Discrimination on the basis of a protected trait in employment is unlawful (also refer policy [4.1 Recruitment and Employment of Educators](#)).

Unlawful discrimination can include where a person or group of people are treated unfairly or less favourably than others because they have a particular characteristic or belong to a particular group of people.

Protected traits include:

- sex, age, race, gender identity or sexuality,
- relationship status,
- pregnancy, breastfeeding, family responsibilities or parental status,
- impairment,
- religious belief or activity,
- political belief or activity,
- trade union activity,
- lawful sexual activity, including status as a legal sex worker.

It is also illegal to discriminate against someone on the basis of an association with a person identified by one of these characteristics.

Harassment

Workplace harassment refers to behaviour that is unwelcome or unsolicited, offensive, humiliating or intimidating and relates to someone's sex, race, age or other attribute protected by any state of federal anti-discrimination legislation.

Harassment, including sexual harassment, is determined by reference to the nature and consequences of the behaviour, not the intent of the initiator, and occurs in circumstances where a reasonable person would have expected the behaviour to be offensive, humiliating or intimidating.

Harassment may be repeated or a one-off incident.

Examples of harassment include, but are not limited to:

- telling insulting jokes about particular racial groups,
- verbal abuse or comments that put down or stereotype certain groups,
- personal insults, comments, name calling or innuendo,
- offensive communications including emails or social media posts,
- making derogatory comments or taunts about a person's disability.

Sexual Harassment and Sex or Gender-Based Harassment

Sexual harassment includes unwelcome sexual advances, requests for sexual favours or other unwelcome conduct of a sexual nature that could be expected to make a person feel offended, humiliated or intimidated.

Sex or gender-based harassment is unwelcome behaviour on the basis of the person's sex or gender, where the behaviour is likely to make a person feel offended, humiliated or intimidated.

Sexual harassment in the workplace can take many different forms and can include:

- Staring, leering or unwelcome touching,
- Suggestive comments or jokes,
- Unwanted invitations or requests for sex,
- Intrusive questions about a person's private life or body,
- Insults or taunts based on sex,
- Sexually offensive communications (phone, email, SMS or other social media),
- Displaying sexually explicit or suggestive materials that are offensive or unwelcome,
- Making sexually charged or inappropriate comments about a person's appearance, gender or sexuality that makes them feel uncomfortable, objectified or creates a hostile or uncomfortable environment,
- Unwanted advancements,
- Involving others (including children) in inappropriate interactions or using others (including children) to convey advances towards another staff member, volunteer or person employed by the Service,
- Extending or engaging in preferential treatment towards a staff member, volunteer or person employed by the Service based on their gender or personal attraction, including but not limited to offering unwarranted praise, opportunities, or benefits, which may be perceived as inappropriate, unwanted, or inequitable, thereby creating a climate of discomfort or unfairness within the workplace.

Sexual harassment and sex or gender-based harassment can take various forms – a singular incident, repeated behaviour or conduct that is obvious and subtle. It doesn't have to be repeated or continuous to be against the law.

The Service acknowledges that it has a positive duty to take reasonable and proportionate measures to eliminate, as far as possible, unlawful conduct such as sexual harassment, sex-based harassment, sex discrimination and conduct that creates a hostile workplace environment on the grounds of sex. A *Sexual Harassment Risk Assessment and Prevention Plan* will be developed in consultation with the Approved Provider to safeguard all employees.

The Service treats all instances of **unreasonable behaviour, bullying, discrimination, harassment, sexual harassment and sex or gender-based harassment** very seriously. Employees found to be engaging in this type of conduct (breaching this policy) will undergo disciplinary action, which can include action up to and including termination of employment.

Reporting Bullying, Discrimination and Harassment

Incidents of unreasonable behaviour, discrimination, or sexual harassment are to be treated seriously, and immediate action must be taken to report allegations.

If an employee feels they are a victim of this type of behaviour they should tell the other person directly that their behaviour is harassing and unacceptable. Any person told their behaviour is harassing or unacceptable should immediately stop this behaviour.

Employees may inform either the Approved Provider, Nominated Supervisor or relevant other person with management responsibilities in person or writing following procedures as set out in policy [4.12 Employee Grievance](#).

Staff who make a complaint of bullying, discrimination or sexual harassment will not suffer any victimisation for making the complaint (where the complaint/allegation is made in good faith, i.e. not vexatious). This also applies to staff who agree to be a witness in a complaint/investigation or have a complaint made against them.

Respectful Conduct and Relationships

The Service [Code of Conduct](#) guides employee's expected standard of behaviour in the workplace and with colleagues.

The Service's culture and outcomes for children are improved through building respectful relationships with each other. Additionally, it reduces the risk of employees finding unreasonable behaviour acceptable.

Examples of respectful and behaviour that should be promoted includes:

- Being polite and courteous to others
- Being inclusive of individuals and the diversity they bring to the workgroup
- Raising issues of conflict before escalation, and pursuing these conversations constructively
- Maintain an individual's privacy and confidentiality

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations:**
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA4 – Staffing arrangements
 - QA7 – Governance and Leadership

Additional Regulatory Context and Guidance

- [Work Health and Safety Act 2011](#)
- [Guide for Preventing and Responding to Workplace Bullying \(WorkSafe Australia\)](#)
- [Anti-Discrimination Act 1991 \(Qld\)](#)
- [Racial Discrimination Act 1975](#)
- [Sex Discrimination Act 1984](#)
- [Disability Discrimination Act 1992](#)
- [Age Discrimination Act 2004](#)
- [Australian Human Rights Commission Act 1986](#)
- [Industrial Relations Act 2016 \(Qld\)](#)

Related Policies and Procedures

- [2.1 Providing a Child Safe Environment](#)
- [4.6 Code of Conduct](#)
- [4.9 Fitness for Work](#)
- [4.10 Managing Employee Underperformance and Misconduct](#)
- [4.12 Employee Grievance](#)
- [7.4 Leading Compliance and Quality Assurance](#)
- [7.5 Governance and Management](#)
- [7.6 Privacy and Confidentiality of Records](#)
- [7.12 Workplace Health and Safety](#)

Forms and Resources

[Sexual Harassment Risk Assessment and Prevention Plan](#)

Policy 4.11 Prevention of Workplace Bullying, Discrimination and Harassment including Sexual Harassment		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V2-03.2025 – Added additional information to all roles and responsibilities, additional procedures relevant to work related events, confidentiality and outcome of complaints, additional points for unreasonable bullying behaviour and sexual harassment		
V3-10.2025 – Policy renamed from Workplace Bullying, Discrimination and Sexual Harassment, enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional procedures relevant to bullying that does not constitute workplace bullying, additional procedures relevant to harassment and gender-based harassment, additional regulatory context and guidance to align with P&C legislative requirements and child safe standards		
V4-04.2026 – added information related to Prevention of Sexual harassment risk management Plan and vexatious complaints		

4.12 Employee Grievance

Policy Statement

The Service is fundamentally committed to providing a safe, respectful, culturally safe and fair environment for all employees and will ensure the effective and timely management of any issues, concerns, or grievances raised by employees.

The Approved Provider acknowledges that a supportive and equitable workplace culture is paramount for the safety and wellbeing of employees and are committed to ensuring all grievances are managed professionally and, in a manner, consistent with the principles of procedural fairness and the Child Safe Standards. Employees are free to raise a grievance without fear of retribution or victimisation. The Approved Provider is dedicated to fostering a culture that addresses employee concerns fairly and reasonably, with the understanding that they will be managed conscientiously and confidentially.

The Approved Provider also recognises their duty to comply with the Human Rights Act (Qld) 2019 and when relevant follow Departmental policy in handling complaints, especially those relating to child safety and human rights. Additionally, the Approved Provider recognises regulatory requirements to have an established complaints procedure and to report allegations of non-compliance with applicable legislation to the Regulatory Authority, particularly those concerning child safety and wellbeing.

Definitions:

Complainant – The employee raising the grievance.

Grievance – A work related concern for which an employee wishes to obtain an action or response. It may be about an incident, situation or decision that the employee believes impacts on work performance or the work environment. In the context of this policy, this includes any concern that may directly or indirectly impact child safety, cultural safety, or wellbeing.

Respondent – The employee responding to the grievance as the defending party.

Procedural fairness – Requests those involved to act fairly in their decision making processes, which may affect an individual's rights, interests or legitimate expectations.

Victimisation – The selective punishment or discrimination of an employee for raising a genuine grievance, particularly one related to child safety or wellbeing.

Roles and Responsibilities

Approved Provider	• Ensure information about how to raise a grievance is provided at commencement and throughout employment with a specific focus on how to report concerns related to child safety and wellbeing. • Support the Nominated Supervisor in handling any grievances raised by employees by providing guidance and advice as required. Ensure grievances are managed in a fair manner, giving an opportunity for issues to be managed free from bias. • Ensure grievances particularly those related to child protection and safety are resolved in an effective and timely manner. • Periodically review the register of complaints to identify systemic issues not being addressed, particularly concerning child safety and cultural safety. • Provide opportunity for grievances to be raised directly where the complainant feels it necessary to do so, especially in cases where the grievance involves the Nominated Supervisor or a direct threat to a child's safety.
Nominated Supervisor	• Lead a culture of fairness, ethical practice and child safety, supporting individuals to raise a grievance without fear of retribution or victimisation.

	• Be the initial point-of-contact for employee grievances particularly those that may have implications for child safety and wellbeing. • Treat all grievances seriously and as a priority, particularly those related to child safety and cultural safety. • Ensure grievances remain confidential unless the grievance involves a risk to a child, in which case reporting obligations and duty of care take precedence.
All Staff	• Communicate grievances through reporting lines described in the procedure. • Report any and all concerns regarding child safety, cultural safety, or wellbeing immediately, regardless of whether it is a formal grievance. • Maintain confidentiality and professionalism at all times, except where a duty of care to a child requires immediate action or reporting to the appropriate authorities.

Key Tasks and Responsibilities

Grievance procedures	The Approved Provider is responsible for ensuring the Nominated Supervisor has relevant grievance information available.
Investigating allegations	The Nominated Supervisor is primarily responsible for the initial handling, management and reporting of employee grievances. The Approved Provider is responsible for ensuring appropriate management action is carried out to fairly investigate and respond to grievances raised.

Procedures

Grievances can transpire in any workplace. Handling them appropriately is imperative for sustaining a child safe, healthy, harmonious and productive work environment. When raising a grievance or complaint, all employees will be presented with procedures that:

- Value the opportunity to be heard.
- Promote conflict resolution.
- Encourage the development of harmonious workplace relationships
- Ensure that conflicts and grievances are mediated fairly.
- Are transparent and equitable.

The Service will ensure that all employees raising a grievance are guided by the following policy values:

- Child safety and wellbeing is the highest priority
- Procedural fairness and natural justice.
- Code of Conduct.
- Culture free from discrimination and harassment.
- Transparent policies and procedures.
- Opportunities for further investigation.
- Adhering to our service philosophy.

Matters of a grievance/complaint relating to child safety, the *Education and Care Services National Law and/or Regulations* or the quality of care provided are required to be notified to the Regulatory Authority immediately. If in doubt, a representative should refer to the Regulatory Authority for further guidance and/or assistance.

Raising a Grievance

Educators will, in the first instance, attempt to raise and resolve the grievance informally directly with the person/s they have the grievance with in a professional manner and at an appropriate time, away from children. This informal approach is not appropriate for any concerns related to child safety. All child safety concerns must be formally reported immediately.

Both parties should try to resolve the issue and develop solutions to ensure the problem does not happen again. Discussions should be based on the principles of privacy, confidentiality, respect and open-mindedness and will not involve other educators, employees, volunteers or visitors (e.g. families/caregivers).

If an employee does not feel comfortable in approaching the Nominated Supervisor, or the conflict is with the Nominated Supervisor, they can contact the Approved Provider directly. This includes any circumstances where the employee feels the Nominated Supervisor's conduct or an issue with the Nominated Supervisor poses a risk to child safety. For this purpose, employees will be kept informed of the current contact details through the Educator Handbook, or other appropriate form of communication, and otherwise will be available on request.

If the person making the complaint (the complainant) is unable to resolve the concern or feels uncomfortable raising the matter directly with the person concerned, the grievance or complaint can be raised with the Approved Provider or Nominated Supervisor who will determine if the matter can be managed informally or if a formal process is required. If the latter is required, the Approved Provider or Nominated Supervisor will ask for the issue to be put in writing by asking the complainant to complete a *Grievance Form*, providing all relevant information, outlining the issue, identifying any other person/s involved and any suggested solution.

All grievances or complaints raised are to be documented on the *Grievance Form* and recorded in the Complaints Register. These records are stored in accordance with policy [7.6 Privacy and Confidentiality of Records](#) – securely, maintaining privacy and confidentiality through password protection.

Educators will be expected to raise any grievance involving suspected or actual unlawful activity (including bullying) with the Approved Provider or Nominated Supervisor immediately and privately.

Educators will be encouraged to raise complaints following the Service's grievance policy and procedures first before approaching an external body, such as a court or Tribunal. However, this does not override the legal obligation to report certain matters, such as child protection concerns, to the relevant authorities immediately.

If the employee feels unsafe or threatened, then appropriate steps will be taken to rapidly rectify this, including contacting the police if necessary.

While the Service supports the right of an employee to raise genuine and legitimate concerns about workplace issues, if a grievance is found to be frivolous, malicious or vexatious, then appropriate disciplinary measures may be taken against the complainant. This does not apply to grievances or concerns raised in good faith regarding child safety, even if they are unsubstantiated upon investigation.

Grievance Management

The Service requests all grievances to be formally detailed in a *Grievance Form*, available to employees. Once a grievance is addressed and resolved, the resolution will be document in the outcomes section of the *Grievance Form*.

When the persons involved cannot resolve the grievance between themselves in a constructive and professional way it will be expected the Nominated Supervisor (or Approved Provider) will manage the grievance which could involve the following actions:

- Investigate the grievance, undertaking an internal investigation to resolve the grievance. This investigation will be conducted with a primary focus on child safety and wellbeing.
- Refer the grievance to an external party to conduct an investigation
- Act as Mediator and attempt to resolve the grievance.

All parties involved in the grievance will be required to maintain strict confidentiality throughout the process. Any breach of this confidentiality could be considered misconduct and result in disciplinary action. However, the Service recognises its duty of care and recognises that confidentiality cannot be guaranteed in the following situations:

- If it is considered that a child or any other person is in danger or at risk of harm
- if disciplinary action or criminal investigation might be necessary.

- if employer liability might be involved.

The internal investigation process will consist of:

- reviewing the circumstances and facts of the grievance and inviting all affected parties to provide information where appropriate and pertinent.
- discussing the nature of the grievance and giving the employee an opportunity to respond.
- permitting the employees to have a support person (eg. family member/friend) present during the meetings.
- preparation of a report for the next level of management, including recommendations and findings.

Mediation may be offered to parties to resolve the grievance. This involves a Mediator facilitating a structured discussion between parties involved with the aim of reaching a mutually acceptable outcome. If an amicable resolution does not occur through mediation, the Mediator will prepare a report for the next level of management which includes:

- the nature of the grievance.
- the procedures followed to date.
- the solution(s) sought.
- the recommended plan of action or resolution.

Grievance Resolution

Outcomes will vary from case to case depending on the nature and circumstances of each grievance and could include:

- the complainant gaining a better understanding of the situation and no longer feeling aggrieved
- the complainant receiving a verbal or written apology
- one or both parties agreeing or being required to participate in some form of counselling, mediation (internally or externally), or training.
- formal disciplinary action up to and including termination of employment.

Both the complainant and the respondent will be notified in writing of the outcome of the grievance, preferably within 7 working days of the grievance being received.

The Nominated Supervisor (or Approved Provider) will provide written notification, should management decide not to proceed with the investigation after initial enquiries, outlining the reasoning to the complainant.

When an agreement is reached, the Mediator will prepare a report to the Approved Provider outlining:

- the nature of the grievance,
- the procedures followed to date,
- the solution(s) agreed upon,
- the plan of action to reach this solution and review time if warranted,
- the report provided to all persons involved in the grievance.

Strategies agreed upon by both parties are to be put in place to help avoid further conflict.

If a written agreement about the resolution of the complaint is prepared, the Mediator will ensure that the outcomes accurately reflect the resolution, is signed in agreement by all parties and a copy provided to all relevant parties and management.

Where the results of an investigation procedure suggest that an individual is at fault, appropriate disciplinary procedures will be followed in line with policy [4.10 Managing Employee Underperformance and Misconduct](#). Disciplinary action will depend on the nature and severity of the behaviour and may include termination of employment, which may be instant dismissal where serious misconduct is deemed to have occurred. In cases where the misconduct poses a risk to children, immediate disciplinary action will be taken in accordance with our duty to protect children.

All finalised documentation and reports will be stored confidentially (refer policy [7.6 Privacy and Confidentiality of Records](#)).

Confidentiality

Whilst all endeavours will be made to preserve the confidentiality of the complainant and the person accused, it may be necessary to speak with other workers or people involved to determine what happened and to maintain the integrity of the investigation process. However, confidentiality is secondary to the safety and protection of children.

Those people who are involved in the complaint (including the complainant, witnesses etc.) are also under a duty to maintain confidentiality and display a commitment to uphold the integrity of the investigation process. If the complainant chooses to bring a support person with them to any meetings, they too are bound by confidentiality. Gossiping and/or the spreading of rumours as a result of, or in connection with, a process followed under this policy will not be tolerated under any circumstances and may lead to further disciplinary action for those concerned.

All meetings will be documented with minutes recorded and treated in a confidential manner. Information including letters of complaint and meeting minutes will be stored confidentially.

Quality Improvement

The Nominated Supervisor and Approved Provider will review the complaints register periodically to track complaints to identify recurring issues and address systemic issues not yet identified with particular attention to any trends that may impact child safety and wellbeing.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
- **Education and Care Services National Regulations:**
 - R.168 Education and care service must have policies and procedures
- **National Quality Standard:**
 - QA4 – Staffing Arrangements

Additional Regulatory Context and Guidance

- [Industrial Relations Act 2016 \(Qld\)](#)
- [Human Rights Act 2019 \(Qld\)](#)
- [Work Health and Safety Act 2011](#)

Related Policies and Procedures

[2.14 Child Protection and Mandatory Reporting](#)

[4.6 Code of Conduct](#)

[7.6 Privacy and Confidentiality of Records](#)

Forms and Resources

[Complaint/Grievance Form](#)

[Complaint/Grievance Management Form](#)

[Complaint/Grievances Flowchart](#)

Policy 4.12 Employee Grievance		
Version and reason for change	Date Implemented	Date of Review
V1-10.2025 – New policy		
V1-04.2026 – No updates		

Policy Group 5

Relationship with Children

OSHC is a social environment. The practices of educators to shape the **respectful and reciprocal relationships** between them and children is central to children learning and belonging. Likewise, OSHC is a place for children to develop connections with one another. Play invites children to collaborate and learn from each other. It gives opportunity to develop life-long social skills.

Relationships are built from upholding the dignity and rights of every child. As children learn and play they rely on various support for educators, including positive behaviour guidance. Educators are expected to engage in best practice to meet the needs of children. Where there are additional or complex needs, the service will explore what are the appropriate supports to address these.

5.1 Interactions and Relationships with Children

Policy Statement

The Service is dedicated to creating an environment where every child's voice is heard, valued, and actively shapes their experience. We believe that children are capable and insightful, and we are committed to fostering their sense of agency by empowering them to be active participants in decisions that affect them.

The Service ensures all educators prioritize building strong, positive, and responsive relationships with children. These relationships are founded on fairness, equity, acceptance, empathy, and deep respect for each child's culture, rights, and community, making every child feel safe, secure, and truly included.

Children's decision-making power is acknowledged, recognising their right to influence their environment and experiences. Children's dignity will always be upheld, ensuring they feel valued, supported and respected as active members of the Service community. Practices to support behaviour will be consistent with positive guidance; empowering children to develop self-regulation and pro-social behaviours through a nurturing environment, secure relationships and positive self-regard.

The Service program and educator practices provide experiences and opportunities for children to interact and immerse themselves in play with their peers. Through fostering group interaction, children will enhance their capacity to interact and develop respectful and positive relationships with each other.

The Service acknowledges the unique contribution Aboriginal and Torres Strait Islander people make to our Australian communities. We are committed to acknowledging and respecting the rich history that our First Nations people give to our country. In doing so, the Service actively seeks to provide opportunities for children to experience and develop their understanding of the customs, traditions, and respect for the land, which Aboriginal and Torres Strait Islander culture upholds.

The Service embeds the National Principles for Child Safe Organisations alongside the Queensland Government Statement of Shared Commitment and Universal Principle and Child Safe Standards. We actively promote a culture of safety and wellbeing, ensuring every child has the right to feel safe culturally, emotionally and physically.

Roles and Responsibilities

Approved Provider	• Ensure obligations under the Education and Care Services National Law and Regulations are met. • Ensure the service provides education and care to children in a way that: • Actively encourages children to express themselves and their opinions, • Empowers children to undertake experiences that develop self-reliance and self-esteem through meaningful choices, • Maintains at all times the dignity and rights of each child • Gives each child positive guidance and encouragement towards acceptable behaviour, • Has regard to the family and cultural values, age and physical and intellectual development and abilities of each child. • Ensure the service provides children with opportunities to interact and develop respectful relationships with each other and educators, staff and volunteers, having regard to the size and composition of the groups in which children are being cared for. • Ensure the Service Philosophy establishes a framework to support the collective practices of the service. • Take reasonable steps to ensure that Nominated Supervisors, Educators, staff and volunteers follow this <i>Interactions and Relationships with Children</i> policy • Ensure staff are equipped and suitable to positively guide and support children who attend the service.

	• Provide a child safe, comfortable and happy environment where children's needs and concerns are proactively sought and responded to. • Value diversity and not tolerate any discriminatory practices • Support decision-making, program design and environment considerations that are consistent with empowering children and establishing nurturing relationships
Nominated Supervisor	• Implement this <i>Interactions and Relationships with Children</i> policy and procedures. • Lead the development and implementation of quality practices across the service to ensure regulatory requirements for interacting with children are met. • Model and encourage positive interactions which lead to supportive, trusting and respectful relationships. • Set high expectations for conduct while recognising the value of educators work and supporting their wellbeing. • Value diversity and not tolerate any discriminatory practices • Ensure children are consistently provided with meaningful opportunities to participate in decision-making processes across all aspects of the service. • Ensure children's views are actively and consistently sought, documented and discussed with their responses and perspectives planned into the program with respect and authenticity. • Utilise the parent's expertise in relation to their child's needs and communicate effectively with parents. • Address conduct and behaviours that are not consistent with policy and procedures. • Ensure parents/guardians and relevant others receive communication of the service's policy and procedures to support relationships. • Address behaviour that requires additional support with responsiveness and dignity.
Educational Leader	• Guide educator's professional development and practice to promote interactions with children that are positive and respectful. • Respect each child's uniqueness, displaying appreciation and respect for children as individuals. • Implement a predictable routine for children with interest-based activities and experiences • Provide a range of planned and spontaneous experiences for children to challenge and maximise learning opportunities. • Establish practice guidelines that ensure interactions with children are given priority and those interactions are authentic, just and inclusive irrespective of difference. • Value diversity and not tolerate any discriminatory practices • Facilitate children's meetings, recording and documenting their conversations and ideas in a children's meeting book. Educators or other children will act as a scribe for what children say, making notes for further follow-up.
All Staff	• Contribute to the development and implementation of quality practices that ensure regulatory requirements for interacting with children are met. • Actively promote and facilitate child-initiated, shared-decision making across all aspects of the service, from daily activities to program development. • Empower children to access and learn from their own life experiences as well as those of their peers and adults around them. • Respect each child's uniqueness, displaying appreciation and respect for children as individuals. • Spend time learning about children's social and emotional development and ways to promote adaptability and self-regulation. • Act as role models to children in every day dealings when interacting with both adults and children. • Be active listeners, observers, scribes and strong advocates for children's rights and perspectives. • Engage with each child to understand their unique developmental and wellbeing needs, interests and cultural identity.

	• Respond to behaviour with positive guidance, re-direction and encouragement. • Use a positive and non-threatening tone when interacting with children in all situations. • Endeavour to be aware of each individual child's values, culture and feelings, and respond appropriately. • Value diversity and not tolerate any discriminatory practices. • Seek additional support from the Nominated Supervisor where children's behaviour continues to pose a risk of harm to safety or wellbeing. • Use a variety of communication strategies inclusive of verbal and non-verbal cues to support the development of relationships with children. • Support children's home language when communicating and interacting to build trust and positive relationships. • Support children and build secure attachments through a collaborative partnership with families. • Regularly reflect on own practice and participate in professional development and in-service training to develop their understanding of child safety, inclusion principles and anti-bias

Key Tasks and Responsibilities

Establish guidelines for practice	The Approved Provider is responsible for ensuring there are suitable guidelines and instruction for educator's and volunteer's interactions with children that reflect the requirement of Regulation 155, with a strong emphasis on children's agency and participation.
Induction procedures	The Approved Provider will ensure the Nominated Supervisor is suitably resourced to provide training and instruction in the skills and strategies required for supporting children, especially around positive behaviour guidance and empowering children's voices.
Monitor educator practice	The Nominated Supervisor and in their absence, the Responsible Person will supervise and monitor educators as they interact and support children. They will provide relevant feedback to increase skills and address concerns as they occur with a particular focus on how educators are facilitating children's active participation and decision-making.

Procedures

Establishing Relational Pedagogy

A positive atmosphere and the wellbeing of children attending the Service is promoted through attentive and nurturing care and quality interactions between educators and children. Children's emotional development and social relationships are supported by role-modelling and enhanced by educators through conversation, discussion and promotion of children's language and effective communication.

Central to the interaction and engagement between children and educators is the delivery of the Service's program. MTOPv2.0, describes how relational pedagogy underpins the ways in which educators build trusting and respectful relationships with children and families. These relationships form a strong element of the program and will reflect policy [1.1 Educational Program Development and Implementation](#) including:

- Opportunities for children to engage in diverse experiences,
- Exploring and engagement with culture, having regard to the community of families,
- Support for a range of ages, physical and intellectual developmental stages,
- The choice, agency and decision making of children, including contributing to the aesthetics and physical environment.

In designing the program and activities for the Service, educators will consult children about how their input will be used and advised of the outcomes of the decisions made, ensuring children have a voice in their level of participation including:

- areas of interest they would like to explore,
- where and how they would like to play, with others, or alone,
- what they would like to use,
- the adults with whom they feel comfortable and secure,
- when and what they would like to eat; and
- how they prefer to sleep or rest.

Educators actively engage children and young people's views and voices on activities and experiences in the program and how they could be appropriately planned to their interests and needs. These responses and perspectives are to be shared with the Educational Leader or members of the program leadership team to ensure that action can be taken to embed feedback and children & young people's voices into the program with respect and authenticity.

Resources and activities will be sourced as to encourage:

- Expression and creativity,
- Active participation and collaborative decision-making,
- Reflect and cater to the interests and abilities of children,
- Satisfy for the range of ages and developmental abilities,
- Accessibility to all children allowing for independence and development of mastery.

Meaningful Interactions with Children

All children have a right to feel accepted and respected. This is a principle set out in the United Nations Convention on the Rights of the Child. The Convention emphasises the importance of children developing connections to culture and community as a means of fostering a strong sense of personal identity and belonging.

The Service provides a comfortable, happy environment where Educators respect each child's uniqueness, displaying appreciation and respect for children as individuals. Educators speak with children in all situations, using a positive and non-threatening tone and ensure all children are given equal opportunities to engage in all experiences and interactions regardless of their age, gender, culture or abilities.

Educators act as role models to children in every day dealings when interacting with both adults and children and should endeavour to be aware of individual children's values, culture and feelings and respond appropriately. Educators ensure that their interactions with children:

- Promote gender equality,
- Promote equality regardless of race, culture or differences,
- Encourage children to develop to their full potential regardless of different abilities or needs,
- Value individual strengths and differences,
- Consider a trauma-informed approach and respond sensitively to children

Educators use a variety of communication strategies including verbal and non-verbal cues to support the development of relationships with children, regularly reflecting on their relationships and interactions with children and how these can be improved to benefit each child. Children are consistently encouraged and supported to initiate conversations about their experiences, express their ideas and feelings, share humour and seek assistance as they take on new challenges.

Educators will encourage children to develop to their full potential regardless of different abilities or needs and provide a stimulating learning environment in which all children are equally encouraged to explore a full range of experiences and emotions that aren't limited by gender, race, culture, religion, ability, socio-economic status, or any other restriction.

Trauma Informed Approach

The Service acknowledges that trauma can have a profound impact on a child's development, behaviour, and ability to form relationships. We recognise that children who have experienced trauma may require additional support to feel safe, secure, and supported.

Educators will adopt a trauma-informed approach by creating predictable environments, fostering nurturing relationships, and responding to children's behaviour with empathy and understanding. The service is committed to recognising the signs of trauma, minimising re-traumatisation, and supporting children's recovery through consistency, connection, and emotional safety.

Where appropriate, the Service will work in partnership with families, allied professionals, and external agencies to ensure children who have experienced trauma are supported in a respectful and sensitive manner, while maintaining confidentiality and prioritising the wellbeing of the child.

Children of Employees

The Service promotes a family friendly working environment for educators which may include the attendance of their own children during the sessions of care that they are working. Where this is the case, all children will be treated equally and fairly and no special provisions will be made for the child of an employee that would not be available to other children enrolled and attending the Service.

Children of employees must be eligible to attend a school age care program as described by relevant legislative instruments, namely the Education and Care Services National Law 2010 and Regulations 2011. Children of employees shall be provided with consistent care, consideration and involvement in the Service as any other child participating in the program.

Employees are expected to perform all duties and responsibilities in a professional manner, as outlined by their role, throughout their employment with the Service, regardless of the attendance of their own children at the Service. Any failure to adhere to the established expectations of the Service, including relevant conflict of interest mitigation protocols, may result in disciplinary action.

The educator/parent will be expected to respond to their own child's behaviour and the behaviour of other children in a fair and consistent way and maintain their professionalism. The behaviour of children of employees shall be managed as it would any other child participating in the program.

Communication with Children

Educators listen attentively giving full attention to children as they engage in interactions and conversation and use their interactions to support the maintenance of home languages and learning English as a second language.

Educators respond sensitively and appropriately to children's efforts to communicate, and to initiate interactions and conversations, actively encouraging and empowering them to initiate conversations about their experiences, express their ideas and feelings, share humour and seek assistance as they take on new challenges.

Educators may use techniques such as sign/body language and other resources/tools to support children with special/additional needs to communicate effectively and should consider the diverse communication needs of all children and apply inclusive strategies to support their full participation in the program.

Behaviour Support and Guidance

Educators will receive suitable instruction, support and training to respond to various developmental stages of the differing ages of the children who attend the service. Educators will apply appropriate behaviour support and guidance techniques which will be consistent with the Philosophy Statement of the service and policy [5.2 Positive Behaviour Support Practices](#), always aiming to empower children in understanding and managing their own behaviour.

Managing Complex and Exceptional Behaviours

Where exceptional support is required for children to interact and behave in a manner to uphold the safety or wellbeing of themselves or others, the Nominated Supervisor will work with educators to develop a behaviour support plan to set out the specific steps educators will carry out to support the child's participation at OSHC. Educators are prohibited from using certain techniques in response to managing unacceptable behaviours as outlined in policy [5.3 Supporting Complex Behaviours](#).

Supporting Children through Difficult Situations

A child's reaction to a stressful or traumatic situation will depend on factors such as their development and maturity and impact of the event on individuals around them. A child may react in unexpected ways. They may act 'normally' at first however, educators must be alert to delayed reactions.

Educators will help and support the child to cope with such situations through:

- Talking to the child about what happened in a way that they will understand and without going into frightening or graphic detail,
- Reassuring the child they are safe (but only if they really are),
- Ensuring the child doesn't jump to conclusions and think they may be to blame in a tragic event,
- Talking about the event with those affected (for example, all children if the event has affected the whole service or the children that have been affected) and letting everyone have their say, including ensuring children have dedicated opportunities to express their feelings and ask questions; and
- Talking to the children about how individuals react to stressful or traumatic situations and that the feelings they have are important and valid.

Should it be required, the Service will liaise with appropriate authorities (such as Child Safety) and follow any recommendations made by such authorities. Should a child make a disclosure, educators are to follow procedures outlined in policy [2.14 Child Protection and Mandatory Reporting](#).

Inclusion, Diversity and Cultural Responsiveness

The Service will collect information about the diversity of culture and linguistics of the child and their family during the enrolment process. The Nominated Supervisor will follow up on any request for considerations and ensure these matters are actioned in the appropriate way.

In all the interactions and communications with families, the Service will seek to be culturally safe. It is expected that educators will respect the multiple cultural ways of knowing, doing and being, and celebrate the benefits of diversity.

Educators will be expected to ensure that their language and daily practices are inclusive and non-discriminatory and promote equality regardless of gender, race, culture or differences. Educators will encourage all children to develop to their full potential regardless of their abilities or needs, acknowledging and valuing children's unique and individual differences.

In planning and implementing the program, we will celebrate a wide variety of cultures, paying particular attention to the cultures identified in the local community. Working in partnership with families, we will celebrate culture in ways that are authentic and respectful.

Educators implement a range of practices to promote inclusion, diversity and cultural responsiveness within the program, including: -

- Providing children with a variety of experiences from a range of social, cultural, linguistic and ability backgrounds,
- Talking to children about differences in positive ways,
- Providing inclusive models when discussing family structures with all children,
- Celebrating occasions that are relevant to a variety of cultures,
- Sharing information with children about different cultures and ability backgrounds,
- Providing inclusive resources, experiences and materials,
- Providing information for children and families in other languages when appropriate,
- Displaying posters and materials that are representative of a variety of social, cultural, linguistic and ability backgrounds; and
- Ensuring the physical environment reflects an inclusive and anti-bias approach.

Embedded within the service's celebration of culture is the recognition of the unique contribution Aboriginal and Torres Strait Islander people make to our Australian communities. Through the Service's Reconciliation Action Plan (RAP), educators will continue to develop their awareness and understanding of Aboriginal and Torres Strait Islander peoples as a vital part of the cultural heritage of all Australians. The Service's program will seek to offer authentic opportunities to promote the value of Australia's First Nations' histories, knowledge systems, cultures and languages.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.166 Offence to use inappropriate discipline
 - s.166A Offences relating to inappropriate conduct
- **Education and Care Services National Regulations:**
 - R.73 Educational program
 - R.84 Awareness of child protection law
 - R.115 Premises designed to facilitate supervision
 - R.155 Interactions with children
 - R.156 Relationships in groups
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA5 – Relationships with children

Additional Regulatory Context and Guidance

- [Approved learning Framework – My Time Our Place V2 2022](#)
- [United Nations Convention on the Rights of the Child](#)
- [National Principles for Child Safe Organisations](#)
- Queensland Government [Statement of Shared Commitment](#)
- [NQF Child Safe Culture Guide | ACECQA](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [1.1 Educational Program Development and Implementation](#)
- [1.3 Sharing the Program and Children's Progress with Families](#)
- [1.4 Excursions, Incursions and Regular Outings](#)
- [2.1 Providing a Child Safe Environment](#)
- [2.2 Supervision and Educator Ratios](#)
- [2.17 Child Safety and Wellbeing](#)
- [4.6 Code of Conduct](#)
- [5.2 Positive Behaviour Support Practices](#)
- [5.3 Supporting Complex Behaviours](#)
- [5.4 Supporting Additional Needs with Inclusive Practices](#)
- [5.5 Promoting Protective Behaviours](#)
- [6.5 Interactions and Communication with Families](#)
- [6.6 Community Communication and Participation](#)
- [7.4 Leading Compliance and Quality Assurance](#)

Policy 5.1 Interactions and Relationships with Children		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V2-06.2024 – Additional procedures relevant to communication with children, supporting children through difficult situations, inclusion, diversity and cultural responsiveness		
V3-03.2025 – Added additional information to all roles and responsibilities, condensed information relevant to behaviour guidance strategies and managing complex behaviours, added reference to Statement of shared Commitment.		
V4-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced key tasks and responsibilities, enhanced procedures, additional procedures relevant to trauma informed approach, additional regulatory context and guidance to align with child safe standards		
V5-04.2026 – additional procedures relevant to inclusion, diversity and cultural responsiveness, added reference to National Law		

5.2 Positive Behaviour Support Practices

Policy Statement

The Service is committed to ensuring the safety and dignity of every child in our care. Our approach to guiding children's behaviour is based on positive methods, promoting secure relationships and upholding each child's rights.

The Service recognises that all behaviour is a form of communication, especially for children expressing challenging or anti-social behaviours. Educators are supported and trained to respond with strategies that prioritise empathy, intention, and respect, focusing on understanding and addressing the underlying needs behind the behaviour. The Service ensures all behaviour support practices are developmentally appropriate, reflective, and designed to safeguard a child's wellbeing and rights as paramount.

We foster positive behaviour and a strong sense of wellbeing through:

- Teaching self-regulations – consistently guiding children to understand and manage their own emotions and actions,
- Respecting individuality – valuing each child, preserving and promoting their self-esteem,
- Encouraging positive choices - using praise and engaging programs to reinforce expected behaviours,
- Creating a safe environment – providing a positive, supportive learning environment with developmentally appropriate experiences and resources,
- Aligning with our core values – Ensuring all practices reflect the child-focused principles set out in our Philosophy Statement.

The Service understands that social and emotional (self-regulation) skills develop over time through experience. Learning takes place when children have trusting relationships with adults who provide positive guidance and consistent feedback, boundaries and positive reinforcement. We engage children in meaningful learning activities to support their growth.

Roles and Responsibilities

Approved Provider	• Develop and implement policies and procedures that actively promote positive behaviour and safeguard children • Ensure that the principles and expectations for responding to and supporting children's behaviour are established and communicated effectively, with a focus on child protection. • Ensure the established practices are consistent with legislation and regulations and prioritising child safety frameworks. • Provide opportunities to support the practices and capacity of educators to respond to children's behaviours with a child safety focus.
Nominated Supervisor	• Liaise with families to address any concerns and relay incidents, always considering the child's perspective and wellbeing. • Provide supervision and direct support to educators, emphasising safe and supportive interactions. • Prioritise safeguarding children and promptly notify/report any inappropriate interaction with a child or children in our care, adhering to all child protection protocols. • Role-model and guide effective positive behaviour support practices, demonstrating a commitment to child safety. • Ensure the program is achieving the identified aims and effective in supporting the behaviour of children, with child wellbeing as the focus. • Provide opportunities to support the practices and capacity of educators to respond to children's behaviours, including training on child protection. • Support the ongoing professional development of educators, openly listen to any concerns, and make sure help is available if needed, particularly concerning child safety matters.

	• Access external agencies if and when required to support children, families and Educators, especially for complex child wellbeing needs. • Develop positive strategies, with input from the child and their parents, to help children self-manage and regulate their behaviour and feelings, promoting their emotional safety. • Work collaboratively with Educators and families in developing individual support plans for children with behaviour concerns, always with the child's best interest and safety as the primary focus.
All Staff	• Ensure practices are consistent with the principles of the service's policies, Code of Conduct and the Queensland Government Statement of Shared Commitment, with an unwavering commitment to child safety and wellbeing when responding to children's behaviour. • Access learning and developmental opportunities to enhance the care and support provided to children, including training in child protection and trauma-informed practices. • Communicate with the Nominated Supervisor or Approved Provider where additional support for children is emerging as a need, especially if there are concerns for a child's safety. • Collaborate in delivering and developing the service's program to meet the needs of children, fostering a safe and inclusive environment. • Spend time learning about children's social and emotional development and ways to promote adaptability and self-regulation, contributing to their overall wellbeing. • Constantly and consistently use positive guidance strategies when reinforcing the service behaviour expectations, creating a predictable and safe environment. • Model appropriate behaviour, including using positive language, gestures, facial expressions and tone of voice to build trust and safety. • Actively monitor children's play and behaviour to pre-empt conflicts or challenging situations, and support children to consider alternative behaviours, prioritising their physical and emotional safety. • Continually observe and evaluate the environment to ensure that no environmental factors are impacting the child's safety or wellbeing. • Encourage children to express and manage their emotions, thoughts and behaviour, and to interact appropriately with peers and others. • Acknowledge children through encouragement when they make a positive choice in managing their own behaviour, reinforcing their agency and positive development. • Regularly reflect on own practice and participate in the improvement of a safeguarding culture within the service. • Engage with each child to understand their unique development and wellbeing needs, interests and cultural identity.
Families	• Engage with the Service in a respectful and collaborative way when discussing child-related incidents, fostering a shared commitment to the child's wellbeing. • Encourage their child to report if they are experiencing inappropriate or unacceptable behaviours from another child, empowering children to speak up for their safety. • Model caring and tolerant behaviour when interacting with children, educators or other parents, contributing to a safe and positive community. • Promote strategies that enable their child to feel empowered and confident if they have to deal with a bullying incident, supporting their resilience and safety. • Where required, work collaboratively with the ECS in developing an individual support plan to support children with behaviour concerns, with the child's safety and wellbeing as the priority. • Never approach other children attending the service regarding behaviour incidents and/or issues. All concerns must be directed to the Nominated

	Supervisor or other relevant Educator to ensure appropriate, safe, and professional handling. Follow the Feedback and Complaints Handling Policy if parents are dissatisfied with the way an incident was managed by the Service, ensuring a clear and safe process for resolution.

Procedures

The Approved Provider promotes a proactive approach to supporting and guiding children's behaviour and acknowledges that children's behavioural issues can be affected by any of the following:

- Age and development level,
- Additional needs,
- Personality,
- Family relationships,
- Relationships with peers and educators,
- Environment (both constructed and natural),
- Social Constructs,
- Unrealistic expectations.

Educators will receive suitable instruction, support and training to understand how they are best to respond to support children's development and individual needs, always prioritising their safety and wellbeing. In responding to children's behaviour and needs, educator's interactions, behaviour support and guidance practices will be consistent with the Philosophy Statement, the service's Code of Conduct, and Education and Care Services legislation at all times (refer policy [5.1 Interactions and Relationships with Children](#)).

Educators will involve the children as far as reasonably possible in developing behaviour expectations for the service. These behaviour expectations will be clear, child-focused, based on supporting the safety and wellbeing of children and others, easy to understand and will be on display throughout the service. This information is also provided in the relevant information issued to all parents/guardians on enrolment.

Educators are required to:

- Model appropriate behaviour, including the use of positive language, and tone of voice, to create a safe and respectful environment,
- Monitor children's play, pre-empting potential conflicts or challenging situations and directing children to consider alternative behaviours, to ensure physical and emotional safety.
- Use positive guidance and encouragement towards acceptable behaviour when prompting the service behaviour expectations, reinforcing a culture of safety.
- Support children to make choices, accept challenges, manage change, cope with frustration and to experience the consequences of their actions, provided there is no risk of harm to themselves or others.
- Consider how the environment is impacting on a child and adjust it to enhance their safety and comfort.

Educators will encourage children to promote their social skills and interaction with each other, including supporting children to develop self-regulation skills. Often this will be through mediation and supporting children to create expectations for their play/games, fostering positive and safe social interactions.

Educators should be providing adequate supervision to intervene early and reduce the impact of further escalation, ensuring children's safety at all times. Educators will also:

- Create a quality learning environment that is positive and supportive and provides developmentally appropriate experiences and resources, contributing to a child's sense of security.
- Implement Behaviour Guidance strategies that support children in building skills and strengthening positive behaviour based on age-appropriate behaviour expectations and aiming to prevent unsafe behaviours.
- Implement strategies for guiding children's behaviour resulting in decreasing challenging behaviours to maintain a safe environment.
- Communicate effective child-specific strategies with Educators to ensure consistency in approaches.

- Communicate with families/caregivers when instances of Moderate and Severe Transgressions arise, prioritising transparency and collaborative safety efforts.

To remove any doubt, educators are not permitted at any time to use corporal punishment or any unreasonable physical force/restraint, or physical, verbal or emotional punishment and practices that demean, humiliate, frighten or threaten a child. These actions are strictly prohibited as they compromise child safety and wellbeing.

Program

The Service recognises the relationship between the design of, and engagement in, the service's program and the behaviour of children and is committed to developing a quality and considered program to meet the needs of children and families with a primary focus on creating a safe, engaging, and supportive environment. All children will be provided with opportunities to guide the development of the program, and the Educational Leader will work collaboratively to ensure it aims to meet the needs of all children attending the service, ensuring their safety and inclusion.

The Service's program will support children's behaviour through:

- Promoting routines that are relaxed and comfortable, ensuring children are not rushed to transition or having to wait for unreasonable timeframes, reducing stress and promoting a sense of security.
- Designing for flexibility in routines to maximise choices and child-initiated experiences, empowering children and fostering a positive environment.
- Being engaging, diverse, challenging and stimulating to cater for the wide developmental needs of children, including:
 - social (group) and independent (solitary) play, and
 - robust and quiet play.

While respecting each child's capabilities and 'comfort zone', Educators should encourage children to try new things, always within a safe and supportive environment. Where possible, educators are to make activities as achievable as possible for all children. This may mean changing the rules slightly for an individual child, or for a group of children, removing some physical limitations or offering subtle support, ensuring all children can participate safely and feel successful.

Positive Guidance Strategies

Behaviour guidance strategies implemented within the Service are appropriate to the child's age and developmental capacity and always prioritising their emotional and physical safety. Children are supported to make their own decisions and are provided with opportunities to develop independence and self-regulation skills. Where safe and appropriate, children are provided opportunity to make choices and experience the natural consequences of these choices, provided there is no risk of physical or emotional harm to themselves or others. While children's efforts are always acknowledged, particular attention is given to recognising and praising positive choices in behaviour management to reinforce their development of self-awareness and responsibility, fostering a sense of accomplishment and safety.

The relationships and interactions between educators and children are critical to effectively supporting and guiding behaviour and building a foundation of trust and safety. The following principles will be used by educators to establish an environment and culture in which the behaviour of children is best supported:

- Role model behaviour that demonstrates the service's expectations to children, creating a clear and safe behavioural framework.
- Build secure, reciprocal relationships with children through listening with warmth and being available and responsive to needs, fostering a sense of belonging and safety.
- Communicate with the child to enable them to express their needs and help you to talk about the service's expectations, promoting open and safe communication.
- Use positive reinforcement and praise to communicate to children when they are behaving in ways that meet expectations, encouraging positive and safe choices.
- Create a calm, fun and safe environment to reduce anxiety and stress for children and educators, ensuring a protective and nurturing atmosphere.

Educators will respond to children's behaviour with support, care and intentional teaching recognising behaviour as an opportunity to guide learning, build skills and strengthen relationships, always with the child's wellbeing in mind. Educators should use positive guidance strategies that include but are not limited to:

Caring gesture and/or assistance	• Encouragement, support, and/or assistance offered by an educator to prevent a child from becoming frustrated or disengaged with a task or activity. The help can take many forms such as– asking for other children to support, supplying additional materials or information, providing alternative equipment, or assisting with completing some of the initial tasks. • A caring gesture could also include warm attention to help coping with a stressful or difficult situation. Strategic use can help a child whose own self-control is deteriorating to support in gaining composure. • A caring gesture may include using humour to reduce immediate tension and allow a child to avoid a power struggle.
Changing the environment and proximity	• Educators should identify the impact on the environmental factors on children's behaviours (space, noise, routines, level of engagement, social influence). • Identify the factors and issues that could prevent, reduce or modify the situation, to help reduce problematic behaviour. Learn to recognise and pre-empt individual children's 'triggers'. • Likewise, the physical distance between an educator and children can impact on behaviour. Controlling the distance between educators and children can provide be an inconspicuous influence. An educator might approach a child when they are using inappropriate behaviour with the aim of prompting a child to use more appropriate behaviour, to create a safer and more manageable environment.
Prompting	• Reminding a child of the service's expectations or encouraging the child to use a skill or certain behaviour. • Prompting is effective when a child is having difficulty with responding to an instruction or cue. • Prompts can be verbal (directions or suggestions), visual (pictures or photos), a gesture (pointing to objects or a direction), modelling (teaching the skill). • Before doing an activity, set-out the rules and expectations to support younger children, to ensure clear boundaries and safe participation.
Emotional validation	• Engaging the child in conversation to support them with understanding their behaviour and communication. • The educator should be present and engaged with the child. Central to emotional validation is an accurate reflection, e.g.: ○ "...it looks[or seems] like you are (insert emotion) because I can see (trigger/rationale/observation)". ○ "I hear what you are saying, you seem angry because... let's see what we can do to help." • Recognising the child's emotions are normal in the circumstances - that they are understood, can drain off emotions to allow constructive dialogue to be facilitated. • The conversation may explore the trigger, problem or concern for the child identifying the motivation and drive (interpret events) to help children feel understood and emotionally safe.
Redirection	• Redirection can involve distracting a child when a trigger or behaviour occurs. Its intention is to guide a child's behaviour from inappropriate to appropriate. • Redirection may be required during an incident where a child places him/herself in a dangerous situation, for example, climbing a fence or hiding in a potentially dangerous position. • An easy way to alleviate a child's inappropriate behaviour is to provide something else to engage them with. The substitution could be anything from a learning resource, a toy, a pen and paper for drawing, or it could be an educator's attention until the child is ready to transition to something independently. • Be aware of your own tone, volume of voice and body-language to engage and gain the respect of the children.

	Safety is a priority, and this may involve redirecting other children from the area while a child calms down or having the child collected from the service immediately by an authorised person, to ensure everyone's physical safety.
Behaviour specific praise (reinforcing desired behaviour)	- Appealing to cognitive behaviour influences to space thoughts, feeling and behaviours. - Social reinforcement (authentic praise) is a powerful reward. Aligning this feedback to include the specific positive aspects of the behaviour increases the effectiveness e.g. <i>"(child's name), I really like the way you are sitting quietly and waiting."</i> <i>"That was great you helped pack up without being asked, (child's name)"</i> - Identify those behaviours you wish to promote, prepare children with information about this, identify children displaying the behaviour, describe behaviour in the form of praise, to build positive self-esteem and reinforce safe choices.

Conflict Resolution

The Service recognises the significant opportunity group activities play in encouraging learning and the development of social skills. The service's program will seek to include many opportunities for shared experiences for children that promote cooperation and collaboration between children. The service recognises that children will, at times, require support to navigate collaborative play. The role of the service's educators is to mediate, role-model and guide children to understand the meaning of their interaction to learn life-long skills for positive social interaction, promoting respectful and safe communication.

Educators will support children to explore different points of view, negotiate and to communicate appropriately when resolving disagreements with others.

- When necessary, educators may implement a 'time with' strategy. This is used only after other positive guidance approaches have been attempted and when additional support is required to help manage a situation safely and effectively. 'Time with' provides a calm and supportive moment where an educator stays with the child, offering reassurance and emotional safety.
- It allows the child to settle, regulate their emotions, and begin to regain self-control in a trusted presence.
- Once the child is calm, educators can gently support them to reflect on what occurred, consider the impact of their actions, and explore more constructive responses for the future.
- This strategy is always implemented under the supervision of other educators and may only be used when a child's behaviour presents an immediate and foreseeable risk to themselves or others.
- The approach should only be used if no other reasonable means of ensuring safety can be actioned. Educators will then utilise this time to ensure no danger or threat is posed and to speak with children involved to resolve the incident, emphasising safety as the core reason for its use.

Where required, an educator may use their discretion to remove a child from the area to allow a cooling off period and to ensure the incident can be more appropriately managed. An educator may only use this approach where the child is behaving in a way that it possesses immediate foreseeable risk to themselves or others. The use of exclusion in this way can only be used if no other reasonable means of ensuring safety can be actioned. Educators will then utilise this time to ensure no danger or threat is posed and to speak with children involved to resolve the incident, with the explicit focus on mitigating risk and ensuring safety.

Supporting Positive Interactions and Relationships

Mediate	- Facilitate shared understanding by supporting children to express their perspectives, creating a safe space for communication. - Create an environment where children can communicate constructively, fostering positive and safe interactions.
Role-model	Demonstrate social interactions that are warm, respectful, secure and reciprocal, teaching children how to engage safely and kindly.

	Interactions with children and colleagues demonstrates active listening, self-regulation and collaborative partnerships, contributing to a safe and supportive environment for all.
Guide	- Prompt children to support their understanding of the service's expectations and their own coping strategies in managing conflict, equipping them with tools for safe social engagement. - Proactively support children by teaching using intentionality to support the development of interpersonal skills, building their capacity for safe and healthy relationships.

Identifying and Monitoring Bullying

Educators can assist children recognise bullying behaviour and support them in developing strategies to develop positive relationships and prevent bullying. Educators support children to develop strategies in preventing bullying including:

- Empathy - understanding and responding to what others feel
- problem solving - how to resolve problems constructively without using aggression
- language - understanding what to say when the child is feeling targeted by another child- 'stop it!'

Behaviours that do not form bullying include:

- Not liking someone or a single act of social rejection
- One off acts of spite
- Isolated incidents of aggression, intimidation or violence

Educators will teach social skills through role-plays, stories and games and guide children to practice how to interact with others positively and respectfully when talking about bullying.

Where Educators suspect bullying behaviour they may pay closer attention to interactions among children and will encourage children to report bullying behaviours so they can be addressed appropriately.

Educators will support children to:

- Tell the difference between conflict and bullying, empowering them to identify unsafe situations.
- Communicate respectfully during disagreements, promoting peaceful conflict resolution.
- Initially aim to manage conflict between themselves, fostering autonomy within safe boundaries.
- Seek help when behaviour becomes hurtful, encouraging them to seek adult support when feeling unsafe.
- Build empathy and respectful friendships, contributing to a safer and more inclusive environment.

This helps create a safe and supportive environment for all children where their safety and wellbeing are paramount.

Documenting Behaviours of Concern

The Service will document relevant behaviours that occur where a child has caused harm or could have caused harm to another person or themselves, has harassed or abused another person or any other incidents that service management believe warrant an incident form. This documentation is vital for monitoring and addressing potential threats to child safety and wellbeing.

Examples include, but are not limited to:

- Punching, hitting, kicking or physically attacking others,
- Throwing objects that could cause significant harm or injury,
- Threatening to attack or harm others,
- Bullying or repeated instances of abusive language towards others,
- Absconding.

Incident forms are utilised as key pieces of supporting evidence when making decisions towards the suspension and exclusion of a child (refer policy [5.3 Supporting Complex Behaviours](#)), with all decisions made in the best interest of child safety.

Additional Support

Where a child's behaviour poses a significant risk to safety of themselves or others and every reasonable attempt to deescalate has been ineffective, the child's parents/guardians or emergency contact will be called to collect the child from the Service. Procedures outlined in policy [5.3 Supporting Complex Behaviours](#) will then be followed, always prioritising the immediate safety of all children.

Educators will complete recording and reporting procedures outlined in policy [2.4 Incident, Injury, Trauma and Illness](#) when a child has been prematurely collected from the Service due to their behaviour, ensuring transparent and accountable safety practices.

If a child continues to exhibit unacceptable behaviour after all methods have failed to result in improvement. The Nominated Supervisor may discuss care options with the parent/guardian taking into consideration the health and wellbeing of all children in care, with safety as a guiding principle.

The Service works toward being inclusive of children and supports children to settle into the service. A child's care will not be terminated without consultation and strategies being exhausted with the Nominated Supervisor and families (refer policy [5.3 Supporting Complex Behaviours](#)), ensuring that all efforts are made to support a child's inclusion and wellbeing before any drastic measures are considered, and only if safety cannot be reasonably maintained.

Behaviour support plans will be implemented if deemed necessary by the Nominated Supervisor. Support plans will be developed collaboratively with the Nominated Supervisor/Service leadership, parent/guardian, child, the school (where relevant) and other health/educational professionals as required, with the explicit goal of promoting the child's safety and positive behaviour.

Prohibited Actions

Educators are not permitted at any time to use physical force/restraint or physical, verbal or emotional punishment and practices that demean, humiliate, frighten or threaten a child. Discipline must be reasonable in the circumstances. Additionally, corporal punishment must never be used as a disciplinary measure.

Educator Training and Professional Development

The Service will support Educators with increasing their knowledge and understanding of positive behaviour support practices through the provision of regular professional development training. Specialised training may be sought where considered necessary to support educators with knowing and understanding children's behaviours and specific health and wellbeing concerns, including child protection and trauma-informed care.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.166 Offence to use inappropriate discipline
 - s.166A Offences relating to inappropriate conduct
- **Education and Care Services National Regulations:**
 - R.155 Interactions with children
 - R.156 Relationships in groups
 - R.168 Education and care service must have policies and procedures

- R.170 Policies and procedures to be followed
- R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety
 - QA4 – Staffing arrangements
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities.

Additional Regulatory Context and Guidance

- [United Nations Convention on the Rights of the Child](#)
- [National Principles for Child Safe Organisations](#)
- Queensland Government [Statement of Shared Commitment](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [1.1 Educational Program Development and Implementation](#)
- [1.3 Sharing the Program and Children's Progress with Families](#)
- [1.4 Excursions, Incursions and Regular Outings](#)
- [2.1 Providing a Child Safe Environment](#)
- [2.2 Supervision and Educator Ratios](#)
- [4.6 Code of Conduct](#)
- [5.1 Interactions and Relationships with Children](#)
- [5.3 Supporting Complex Behaviours](#)
- [5.4 Supporting Additional Needs with Inclusive Practices](#)
- [5.5 Promoting Protective Behaviours](#)
- [6.5 Interactions and Communication with Families](#)
- [6.6 Community Communication and Participation](#)
- [7.4 Leading Compliance and Quality Assurance](#)

Policy 5.2 Positive Behaviour Support Practices		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V2-03.2025 – Added additional information to policy statement, information added to NS and Educator roles and responsibilities and added families. Added procedures relevant to behaviour expectations, positive guidance strategies, conflict resolution, documenting behaviours of concern, additional support, educator training, added reference to Statement of shared Commitment.		
V3-10.2025 – Updated policy statement, enhanced roles and responsibilities, enhanced procedures, additional procedures relevant to trauma informed approach, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

5.3 Supporting Complex Behaviours

Policy Statement

The Service is committed to ensuring children receive positive behaviour support as they learn and develop. We recognise that at times, children may display behaviour that is unsuitable for the setting. Behaviours of serious concern are those that present a significant risk to the physical or emotional safety of the child themselves or others, and/or genuinely threaten the overall wellbeing of any child or staff member. On these occasions, the Service is committed to plan, support and reflect on opportunities for individual consideration to achieve the best and safest outcomes for children and their families.

In responding to behaviours that the Service recognises as complex, parents/guardians will be invited to collaborate with the Nominated Supervisor (or their delegate) to identify strategies to ensure the safety and wellbeing of everyone in our care. Planning will focus on actions to support the child to learn new safe, and positive behaviours (e.g., appropriate communication, social skills, and emotional regulation) and critically, to reduce the risk of further incidents and prevent harm.

Where opportunities to support the child have been implemented without sustained success, or where the immediate and ongoing risks to safety are deemed too extreme to manage within our current capacity, The Service may exclude the child from attending either temporarily, or in some serious cases, permanently. Any such decision will be made with the utmost consideration for the safety of all children and staff.

Roles and Responsibilities

Approved Provider	• Establishing processes to ensure children are provided with an opportunity to be supported to learn and enhance behaviours and skills that support them to meet the service's expectations. • Ensure educator's practices actively promote and protect each child's wellbeing and rights in responding to their behaviour, adhering to all child protection standards. • Provide mechanisms for constructive and collaborative partnerships to identify effective strategies for supporting children's behaviour with a focus on risk reduction and safety. • Ensure the immediate and ongoing safety and wellbeing of all children accessing the service at all times.
Nominated Supervisor	• Facilitate a collaborative planning process to understand a child's behaviours and identify suitable strategies and responses to support safe learning and emotional wellbeing. • Work in partnership with families to promote inclusion of all children within the OSHC Service, unless inclusion demonstrably compromises the safety or wellbeing of others. • Monitor the effectiveness of the developed support plans and communicate areas for further support, with a consistent focus on safety outcomes. • Coordinate plans, including relevant resources and training with the service's educators, ensuring they are equipped to maintain a safe environment. • Access external professional support to ensure children's inclusion in the Service's program, where such inclusion can be safely managed. • Document all communication and meetings (informal and formal) with families and outside professional support, maintaining a clear record for accountability and child protection. • Provide open and supportive ongoing communication with parents/guardians, especially regarding any safety concerns. • Consult with the Approved Provider where planning and support is not addressing the behaviour needs of the service, particularly when safety risks persist.

All Staff	• Support children to make choices, accept challenges, understand and manage change, cope with emotions and to understand that all actions have consequences, within a framework that ensures their safety and emotional security. • Develop and maintain trust, understanding, patience and clear communication with all children, fostering a safe and predictable environment. • Discuss behaviour expectations with children on a regular basis, supporting them to understand how their actions contribute to keeping everyone safe and respected. • Offer children other ways of communicating their needs, regardless of their developmental stage, to prevent escalation and promote safe expression. • Manage and accurately record all observed or reported incidences of bullying, or any behaviours that pose a direct risk to the safety and wellbeing of any child or person by completing an <i>Incident, Injury, Trauma and Illness Report</i> • Support the preparation, implementation and delivery of positive behaviour support plans. • Followed the developed strategies and communicate relevant information on the effectiveness to management, especially concerning any impact on safety or wellbeing.
Families	• Work collaboratively with educators and professional agencies when required in order to develop a broader understanding of the child's developmental level and share any recent events which may be influencing the child's behaviour, to contribute to a comprehensive safety plan. • Work in partnership with educators and health professionals in the development of an <i>Individual Support Plan</i> to assist with the identification of challenging behaviour, the development of proactive and safe supportive strategies and the review of strategies implemented within an <i>Individual Support Plan</i> where required, always with the child's safety and wellbeing as the focus.

Procedures

Following a significant incident or where it has been identified a child's experience will be improved through intentional behaviour support planning, the Nominated Supervisor (or their delegate) will invite the parents/guardians of the child to meet to discuss strategies for supporting the child. Depending on the severity and immediacy of the risk, the child's attendance may be temporarily suspended to ensure the safety of all children and staff until a comprehensive positive behaviour support plan is developed and agreed upon.

Managing Unacceptable Behaviour

Educators are prohibited from using certain techniques in response to managing unacceptable behaviours. This list is not exhaustive, but as these practices compromise a child's safety, dignity, and wellbeing they include the following:

- Physical punishment of any kind, including corporal punishment.
- Imposition of inappropriate tasks that are demeaning or beyond a child's reasonable capacity (e.g. scrubbing floors would be inappropriate, whereas tidying-up toys would be permissible as a natural consequence),
- Any action designed to embarrass or humiliate the child,
- Use of physical presence to intimidate the child (e.g. aggressive stance, blocking pathways),
- Refusing opportunities for essential needs like food or drink,
- Withholding first aid or other medical assistance if it is required,
- Restricting liberty (e.g. holding child in a locked room unsupervised or any form of unsafe restraint).

The Service in consultation with the Approved Provider have categorised behaviours by severity to ensure appropriate, timely, and safety-focused management and support can be provided.

Minor behaviours include:

- Ignoring instructions from educators,
- Going into out of bounds areas,
- Disregarding the Service behaviour expectations.

When these circumstances occur, Educators will:

- Kindly remind children of the expected behaviour, explaining its connection to group safety.
- If the behaviour continues, a clear warning will be issued, highlighting the potential impact on others.
- If the behaviour continues, the child will be removed from the situation to another area within the group, to provide a safe space for reflection and to protect other children's experience.
- If the behaviour further continues, the child will be asked to sit with **the** Educator to reflect on their behaviour, with the educator providing support and guidance on safer choices.
- Educators may refer children to the Nominated Supervisor if the behaviour continues, especially if there's a pattern that could escalate into a safety concern.

Major behaviours include:

- Continuously swearing at other (children and/or educators/adults),
- Hitting, kicking or bullying,
- Disrespect to Educators,
- Deliberately breaking equipment, stealing
- Running away from group,
- Continually ignoring Educators instructions,
- Leaving school or the Service grounds,
- Physically causing harm to other children or educators.
- Or any action that significantly compromises the safety of the environment.

When these circumstances occur, Educators will (depending on the severity and immediate safety risk of the behaviour):

- Give the child a firm and clear warning about the behaviour, emphasising the safety implications.
- Redirect the child for reflection/cooling off time (appropriate for the child's age), ensuring they are in a safe and supervised space.
- Redirect the child to a different location within the group, to prevent further harm or disruption to safety.
- Refer children to the Nominated Supervisor or the OSHC office for extreme behaviour, as these situations require immediate management to maintain safety.
- Parent/guardian is spoken to, or an email is sent home outlining the child's behaviour and the required action, to ensure collaborative efforts in promoting the child's safe behaviour
- Parent/guardian contacted to collect the child if the behaviour poses an immediate and unmanageable risk to safety.

Major behaviour issues will be discussed with parents/guardians, the child may be suspended and their input into individual support plans will be sought prior to the child returning to care. The focus of these discussions and plans will always be to ensure the child can safely and positively reintegrate into the service without compromising the safety or wellbeing of others.

At the end of the suspension period a meeting will be held with the Nominated Supervisor and the parents/guardians to discuss possible strategies for the safe and successful inclusion of the child back within the Service. The date of this meeting will be arranged upon suspension and must be conducted prior to the child's readmittance at the Service. If this meeting is not completed, the child will not be able to attend as collaborative safety planning is essential.

Severe behaviours

Where a child regularly and consistently exhibits major behaviours or poses an immediate and significant danger to themselves or others, Educators will:

- Give the child a warning about the behaviour, unless immediate intervention is required for safety.
- Move the child from the physical environment due to immediate duty of care if the child or other children are in harm's way, ensuring rapid safety intervention.

- If the behaviour is repeated, the child will be redirected to the OSHC office, for immediate higher-level intervention to secure safety.
 - If the child refuses to leave the group, the child's parents/guardians will be contacted requesting the child be collected as their presence is compromising safety.

If the child's behaviour jeopardizes their own safety or the safety of others significantly and immediately, no warning will be given and the child will be referred directly to the Nominated Supervisor or Responsible Person in Charge who might need to collect the child from the group.

Parents/guardians will be spoken with, and a letter from the Approved Provider will be sent outlining the child's behaviour and the required consequences including the length of any such suspension.

At the end of the suspension period a meeting will be held with the Nominated Supervisor and the parents/guardians to discuss possible strategies for safe and supportive inclusion of the child back within the Service. The date of this meeting will be arranged upon suspension and must be conducted prior to the child's readmittance. If this meeting is not completed, the child will not be able to attend, as a plan for safety and successful reintegration is non-negotiable.

If upon the child's return, there are further instances of breaching the Service's behaviour expectations that compromise safety or wellbeing, Incident Report forms will be completed, and the parent /guardian will be required to sign the Incident Report form upon review with the Nominated supervisor (or their delegate). The Incident Report form will be kept in the individual child's file, serving as a record of safety concerns and interventions.

If unacceptable behaviour that compromises safety or wellbeing is continually evident upon readmission after documented suspension, permanent exclusion will apply with the Approved Provider kept informed at every stage of the process as the long-term safety of the service community takes precedence.

For before school care sessions

The Nominated Supervisor or Responsible Person in charge will use their discretion as to how to proceed. Parents/guardians will be called and notified, and the child may be excluded from play for that morning or depending on the type of behaviour, the child may be required to be collected from the Service, with decisions driven by the immediate safety needs.

Initial Intensive Behaviour Support

Depending on the level of support required and the significance of behaviour, the Nominated Supervisor may choose to coordinate some initial intentional support strategies to effectively support a child before needs require escalation to a fully developed positive behaviour support plan and to mitigate potential safety risks early. Monitoring the support provided to children will determine the progress to collaboration with parents/guardians (formal Positive Behaviour Support Planning).

Initial support planning may be a range of options chosen by the Nominated Supervisor and could include:

- an informal discussion to prompt educators to be intentional in how they respond to a child's needs, focusing on preventative safety measures.
- development of specific strategies to engage the child and positively impact behaviour, reducing safety concerns.
- an internal meeting with key staff members to draft an initial plan to support a child's behaviour, with a focus on maintaining a safe environment.
- Assessment of the environment and resources to engage the children in preferred activities, to proactively remove triggers for unsafe behaviours.
- Informal discussion with parents/guardians about likes/dislikes for ideas for programmed activities to inform safe and engaging programming.

The Nominated Supervisor will communicate the intentions and actions with parents/guardians, ensuring transparent and collaborative communication in supporting children to meet the service's expectation, always with a focus on promoting safe interactions. Any plans developed to support a child will be an extension of the services positive behaviour support practices (refer policy [5.2 Positive Behaviour Support Practices](#)).

Positive Behaviour Support Planning

Positive behaviour support plans have three main components: understanding the child/behaviour, a plan to support the child, steps to assist with implementation. The service may request families provide written authorisation for the service to meet and liaise with the classroom teacher and school management to further discuss strategies to support the development of an individual support plan to ensure a holistic and consistent approach to the child's safety and wellbeing.

Understanding the child/behaviour

- The Nominated Supervisor will invite the parents/guardians of the child to meet to discuss the child's behaviour and strategies to support the child. The parent/guardian should be informed of the reasons why a behaviour support plan is required, especially if it relates to safety concerns.
- The intention of the support plan is to focus on developing the child's skills and learning. Identifying the child's strengths and interests will frame how the service can best support the child's development, while also addressing any behaviours that compromise safety
- Any relevant information about diagnoses, history, health or environmental impacts should be identified and considered as these can significantly influence safety and wellbeing.
- The important aspect to formulating a sound plan to respond to behaviour is understanding the drive and function of any behaviours of concern. The Nominated Supervisor, educators and parents/guardians should identify any indications to what might lead to this behaviour and proactive strategies to reduce any escalations and ensure safety. Examples include but are not limited to:
 - How the program and routines are organised.
 - The child's engagement and interactions with others.
 - The learning environment and sensory needs.

Support strategies

- The Service's planned actions are developed to promote and encourage acceptable behaviours and will focus on creating proactive strategies (skill development) and behaviour support responses (de-escalation techniques):
 - **Proactive strategies** should be an extension of the assessment of the child's behaviour. They should be developed to encourage the child to develop skills to promote more acceptable behaviours. Types of skills the Service can aim to address include social skills, coping skills, and self-regulations of behaviour, all of which contribute to a child's ability to act safely.
 - **Response strategies** are those actions educators will use to de-escalate a child's behaviour during an emerging crisis/incident. There will be an emphasis on early de-escalation to prevent an incident occurring and maintain safety. Reactive strategies are those actions educators will use that prompt effective responses to diffuse behaviours, prevent injury or damage and keep everyone safe.
- Plans developed to support children's behaviour will provide an actionable and accountable collection of tasks for the Service to undertake. All strategies must be consistent with positive behaviour support requirements and best-practice, with child safety as the overarching priority.

Implementation

- Any additional resources, support or training that the effectiveness of the plan is contingent will be identified and assigned responsibility, especially if critical for maintaining safety.
- Parents/guardians are encouraged to collaborate throughout the planning and implementation of positive behaviour support plans. There will be continual monitoring of the effectiveness, and any identified concerns will prompt a re-evaluation of the content and additional supports particularly if safety outcomes are not being met.

Exclusion/Suspension based on Behaviour

If a child's behaviour causes or may reasonably cause immediate and significant physical danger to other children, educators or themselves, the parent/guardian of that child will be contacted immediately and asked to collect the child. The child will be excluded from the program effective immediately and the lifting of the exclusion will be at the discretion of the Nominated Supervisor and Approved Provider. This immediate exclusion is a critical measure to protect the safety of all individuals in the service.

The Nominated Supervisor will review relevant reports and plans with the Approved Provider and explore an action plan up to and including the possibility of suspending a child's attendance, with decisions always driven by the need to maintain a safe environment.

Unacceptable or unsafe behaviours

The service has a paramount Duty of Care to ensure the health, safety and wellbeing of all children who attend and Educators who work within. Exclusion from the service can occur either temporarily or in some instances permanently if:

- A child exhibits inappropriate behaviour, or behaviours which threatens the safety or wellbeing of any child or other persons in the service,
- In the Nominated Supervisor's reasonable opinion, the behaviour amounts or may amount to an imminent threat to the safety or wellbeing of *any* child or other person in the service; and behaviour support procedures have been properly applied first but without success, or the behaviour presents such an immediate potential threat that it is not reasonably possible to apply those procedures without risking harm.

If a child with additional support needs demonstrates the abovementioned behaviours the Nominated Supervisor will discuss with parents/guardians and the Approved Provider to come to a resolution. If permission is granted in writing by the parent/guardian, a meeting will be sought with the school administration or class teacher to discuss strategies. If the child's behaviour continues and the service's duty of care to ensure a safe environment is considered to be at risk, the same exclusion process will apply.

Where possible, all elements of policy [5.2 Positive Behaviour Support Practices](#) will be exhausted before exclusion. If unacceptable behaviours continue despite support efforts, and continue to compromise safety, the following steps will be taken:

- The Approved Provider will be notified and
- A letter will be emailed to the parent/guardian detailing the child's behaviours, exclusion time and expected return date, emphasising the safety concerns.

Prior to the child's return, a meeting will be held between the Nominated Supervisor, parent/guardian and child to discuss possible strategies. A behaviour support plan may be developed for including the child back into the program, focused on re-establishing a safe environment. If the child returns to the Service and the same behaviours that compromise safety continue, the child will be excluded permanently from the Service to uphold the safety and wellbeing of all members of the Service community.

Ongoing or permanent exclusion

The Approved Provider have the legal duty to ensure the health, safety and wellbeing of children, educators, families, staff members and volunteers at our OSHC Service. To promote respectful and effective partnerships with families, we ensure that each child and family participate in a comprehensive induction including detailing our terms of enrolment, as per our legal agreement, which advises families on the Services' right to terminate a child's enrolment if a service policy (especially those related to safety) has been breached.

Exclusion from the service is at the discretion of the Nominated Supervisor in consultation with the Approved Provider. Exclusion may be implemented for any of the following reasons, all of which are ultimately linked to maintaining a safe and healthy environment:

- If the severity of the behaviour has caused significant physical or emotional harm to an Educator or individual that requires significant intervention or hospitalization.
- If the behaviour displayed from the child has been previously discussed and a behaviour support plan has been implemented and has had no positive impact on the behaviour in terms of improving safety or wellbeing.
- If the child has been suspended or excluded for unacceptable or unsafe behaviours on multiple occasions and the unacceptable behaviour continues to pose a risk.
- If the parent/guardian has not been supportive of the steps put in place by the service and worked with the service to implement the previous process, thereby hindering efforts to ensure safety.
- If a child puts themselves or another person at significant risk on multiple occasions.
- If a child displays potentially dangerous behaviours that could cause serious harm to the wellbeing of children or educators.

- If a child leaves the premises on multiple occasions jeopardizing the duty of care to ratios of the other children and compromising their safety.

The child will be excluded from the program effective immediately and the lifting of the exclusion will be at the discretion of the Nominated Supervisor and Approved Provider. Any decision to exclude a child will be communicated to the parents/guardians in writing and will outline the conditions for re-enrolment, where relevant with the overriding consideration being the safety and wellbeing of the entire service community.

Exclusion from School

Any child suspended or excluded from the school will automatically be suspended or excluded from the Service as their presence at the service could compromise our ability to maintain a safe and consistent environment aligned with school expectations.

Fees may still be applicable as per policies [6.3 Bookings and Cancellations](#) and [7.10 Fees, Statements and Parent Gap Fee Payments](#).

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.166 Offence to use inappropriate discipline
 - s.166A Offences relating to inappropriate conduct
- **Education and Care Services National Regulations:**
 - R.155 Interactions with children
 - R.156 Relationships in groups
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.181 Prescribed enrolment documents to be kept by the Approved Provider
 - R.183 Storage of records and other documents
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities.

Additional Regulatory Context and Guidance

- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [1.1 Educational Program Development and Implementation](#)
- [1.3 Sharing the Program and Children's Progress with Families](#)
- [1.4 Excursions, Incursions and Regular Outings](#)
- [2.1 Providing a Child Safe Environment](#)
- [2.2 Supervision and Educator Ratios](#)
- [4.6 Code of Conduct](#)
- [5.1 Interactions and Relationships with Children](#)
- [5.2 Positive Behaviour Support Practices](#)
- [5.4 Supporting Additional Needs with Inclusive Practices](#)
- [5.5 Promoting Protective Behaviours](#)
- [6.1 Access for Families](#)
- [6.5 Interactions and Communication with Families](#)
- [7.4 Leading Compliance and Quality Assurance](#)

Forms and Resources

[Positive Behaviour Support Plan](#)

Policy 5.3 Supporting Complex Behaviours		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – New policy		
V1-06.2024 – No updates		
V2-03.2025 – Added additional information to NS and Educator roles and responsibilities and added families. Added procedures relevant to children of employees, managing unacceptable behaviour, positive behaviour support planning, exclusion/suspension based on behaviour and exclusion from school.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional procedures relevant to trauma informed approach, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

5.4 Supporting Additional Needs with Inclusive Practices

Policy Statement

The Service recognises that some children may require tailored support to fully participate due to their individual needs. Our commitment extends to proactively addressing any barriers to a child's full and safe participation, regardless of their ability or needs. When required, the Service will actively partner with the relevant Inclusion Agency to strategically overcome any identified barriers that might hinder a child's full and meaningful engagement within our program, always with their safety and wellbeing at the forefront.

The Service is dedicated to continuously building its capacity to be truly inclusive of children with diverse needs. We profoundly recognise the immense value of every child, including those with additional needs, belonging to and actively participating in our Service. We understand the positive impact this inclusion has on families within the school community, ensuring they can access high-quality, safe, and nurturing education and care services for all their children.

The Service is committed to working in genuine partnership with families and other professionals to ensure thoughtful consideration and personalised adaptations/adjustments are made. This collaborative approach allows children with additional needs safe and equitable access and full, meaningful participation. The Service is dedicated to actively seeking and incorporating children's social and cultural diversity, their unique learning styles, abilities, and disabilities, to ensure every child has positive, empowering, and safe experiences in our setting..

Roles and Responsibilities

Approved Provider	• Actively consult with all families and other professionals to ensure every child, regardless of their abilities, can safely and fully participate in the program and have their voice heard. • Support the development of inclusive practices that prioritise child safety and empower educators to meet the diverse needs of all children. • Evaluate and adjust the environment to provide safe and accessible pathways, enabling all children to develop autonomy, independence, competency, confidence and pride within a secure setting.
Nominated Supervisor	• Liaise with the Approved Provider and families to ensure appropriate individualised planning, comprehensive support and tailored services are delivered to meet the specific safety, wellbeing, and developmental needs of children accessing (or seeking to access) the service. • Meet with families of children with additional needs to familiarise themselves with the specific communication needs of each child. This includes understanding verbal and non-verbal communication skills and cues and may necessitate learning about and facilitating the use of systems such as sign language, visual aids, or key words in the child's home language, ensuring children can express their needs and contribute to decisions about their care and safety. • Develop partnerships with other professionals or support agencies that work with children who have diagnosed behavioural or social difficulties to develop plans for the inclusion of these specific children. This information will be kept confidential and in the individual child's file. • Engage and coordinate with the Inclusion Agency to access essential resources and funding, strengthening the service's capacity to safely and effectively meet the diverse needs of all children. • Work collaboratively with culturally and linguistically diverse children and their families. • Lead the development of an Inclusion Support Plan (ISP) in collaboration with Inclusion Agency professionals, health professionals and parents/guardians of the child with a crucial focus on ensuring the child's safety, wellbeing, and active participation. A copy of this plan will be securely stored in the child's individual record.

	• Support is provided to educators to make reasonable adjustments to enable children with disability to access and participate in the Service on the same basis as others. • Barriers preventing a child's inclusion are identified and strategies to make improvements implemented. • Specific plans and programs provided by external resource providers and professionals for children with additional needs are shared with educators and copies filed in the child's individual record
All Staff	• Consistently treat all children equally, fairly, and with profound respect, upholding their dignity and right to feel safe. • Create an inclusive program and environment, that is highly adaptable and supportive of all children, designed to maximize their safety and promote their wellbeing. • Ensure all practices actively support the inclusion, meaningful participation and strong sense of belonging for all children, regardless of their individual needs and abilities. • Act as role models by consistently displaying appropriate behaviour and respectful language, being aware of and responsively attending to children who may require additional support, focussed attention, or assistance, particularly during times where their safety or wellbeing may be compromised. • Implement programming experiences and activities, that are inclusive for all children to access, explore and participate. • Listen carefully to all children's concerns and discuss issues of inclusion and exclusion, and fair and unfair behaviour • Actively engage in relevant professional development and/or seek out professional resources to strengthen the service's capacity to meet the complex and diverse needs of individual children, with a consistent focus on enhancing child safety and inclusive practices. • Maintain the privacy and confidentiality for all children and families
Families	• Work in genuine collaboration with the Nominated Supervisor and Educators at the Service, forming a respectful partnership dedicated to their child's safety and wellbeing. • Share information about their child's specific needs, their strengths and interests, successful strategies used at home, and identify any routines or situations that may cause physical or emotional challenges, to inform safe and effective support plans. • Provide accurate and up-to-date information about their child's additional needs including relevant reports, documentation, NDIS plans, details about support services and other allied professionals. • Actively help to identify possible barriers to inclusion and propose reasonable adjustments that may be required, fostering a proactive approach to their child's safe participation. • Provide informed consent for the Service to access external professional support if required, particularly when assistance is needed to safely and effectively manage the diagnosed, or undiagnosed additional needs of their child. • Collaborate with external professional support agencies and educators to implement plans designed to actively support inclusion, ensuring the child's safety and successful participation. • Provide written consent for information about their child to be shared on the IS Portal if accessing support under the Inclusion Support Program, understanding this facilitates crucial support for their child's inclusion and wellbeing. • Adhere to our policies that stipulate should the safety or wellbeing of other children and staff be consistently compromised, enrolment may be suspended or terminated as the safety of the service community is paramount.

Procedures

The Approved Provider understands and meets their obligations under the Disability Discrimination Act (DDA) to proactively support children with disability and be responsive and attentive to each child, irrespective of their additional needs and abilities. The Service aims to provide a supportive, safe and inclusive environment that empowers each child to fully participate in education and care at the Service. Educators will remain encouraging, unprejudiced and consistently supportive, ensuring that all children are treated equally, fairly and have every opportunity to safely grow and develop to their individual potential, fostering their autonomy and confidence.

Additional needs may include children who:

- have a disability or developmental delay (physical, sensory, intellectual, or autism spectrum disorder),
- are presenting with challenging behaviours and/or behavioural or psychological disorders that may impact their safety or the safety of others,
- have a serious medical or health condition requiring specific safety protocols.
- are presenting with trauma-related behaviours requiring a trauma-informed and safe approach.

Disability is defined broadly in the Disability Discrimination Act (DDA) and does not rely on formal diagnosis of disability. Disability can be visible or non-visible. Disability in relation to the DDA includes physical; intellectual; psychiatric; sensory; neurological and learning disabilities as well as physical disfigurement. Our commitment to safety and inclusion extends to all these diverse presentations.

Enrolment

The Service's enrolment practices will actively seek opportunities for parents/guardians to identify any additional needs of the child and then provide an opportunity to discuss and plan how the service will cater for any individual needs of the child.

Where the Service recognises further capacity building would be beneficial for a child's participation in the program or additional needs have been identified, the Nominated Supervisor will request to meet with the parents/guardians to discuss inclusion support opportunities, focusing on creating the safest and most supportive environment.

The Service will appropriately and thoroughly assess their capacity to safely include the child within the service through conducting a comprehensive risk management process if necessary. The Service shall maintain the right to make a decision regarding the suitable placement of children with diverse needs based on the available information, support, advice, and a clear assessment of the ability to maintain the safety and wellbeing of all children and staff.

Inclusion Support Practices

Inclusion supports children's fundamental rights to safety and participation, fosters diversity and actively overcomes bias and barriers that may exist preventing children from meaningfully participating in experiences within the Service. Inclusion is consistent with the Convention on the Rights of the Child and other international conventions, including the UN Convention on the Rights of Persons with Disabilities, UN Declaration on the Rights of Indigenous Peoples and the National Principles for Child Safe Organisations.

Inclusion is a practice where environments and programs are thoughtfully planned and delivered to ensure meaningful participation and safety for all children. Inclusive practices are about actively seeking solutions and strategies to address barriers to children's safe participation and engagement. Barriers that can impact children include the physical environment, the educators' beliefs and skills, design and structure of the program, and a family's engagement, understanding and expectation of the service. Addressing these barriers is crucial for creating truly safe and inclusive spaces.

An essential component of inclusive practices is the caring and trusting relationship building with all stakeholders, including children themselves (ensuring their voices are heard), families and the wider

community. Inclusive practices are about the safe participation and genuine connection with all children who access and use (or potentially use) the Service.

Educators promote acceptance, respect and appreciation for individuals with diverse abilities and needs and consult with all families and other professionals to enable full support and inclusion in the Service program. Inclusive practices:

- Foster independence and agency, empowering children to make safe choices.
- Provide a clear voice to children and a genuine opportunity to be heard in decisions that affect their participation and safety.
- Are respectful and responsively tailored to individual needs, promoting a sense of security.
- Build collaboration and provide a cohesive teamwork response to support all children's wellbeing.
- Are meaningful, build on children's unique strengths and are consistently enhanced by reflective practice, with a continuous focus on improving safety and inclusion.

Reasonable Adjustments

Changes to a policy, practice, procedure, program or environment that enables a person with disability to access and participate in the service on the same basis as others. [ACECQA: The Disability Discrimination Act 2022]. These adjustments are fundamental to ensuring equitable safety and participation for all children.

The Service understands that additional needs may be temporary or permanent with diverse origins, which require different responses. Supporting children with additional needs enables them to have equitable and safe access to resources and participation. This can lead to stronger skills in literacy and numeracy, social and emotional development and understanding of diversity. Strategies for supporting children with additional needs can differ significantly, because every child is unique and their safety needs are individual.

Support is provided to educators to make reasonable adjustments to safely support children with disability access and participate in the Service. Completed enrolment forms will be used to gather information about children's additional needs and necessary supports that may be required to ensure their safety and inclusion.

Additionally, the Service will ensure equitable and safe access is provided to support children with additional needs and communication with families is consistent and supportive in developing effective relationships with school leaders and the OSHC service to support the child, creating a united front for the child's wellbeing.

NDIS plans

The Service acknowledges that children with complex health and support needs may have a multi-faceted support plan funded through the National Disability Insurance Scheme (NDIS). The Nominated Supervisor will ensure families with children who have a current NDIS plan are invited to meet with service leaders to review their child's NDIS plan and collaboratively develop goals to assist and help the child build their skills, independence, and capacity for safe participation within the service.

Allied Health Professionals

The Service works in close partnership with allied health professionals and families to verify that the educational program and learning environment are truly inclusive and safe for each child with additional needs, including children and families from culturally diverse backgrounds. Specific plans and programs provided by external resource providers and professionals for children with additional needs are shared with educators and copies filed in the child's individual record, ensuring all relevant information is accessible for maintaining the child's safety and wellbeing.

The Service may at times facilitate the visit of an allied health professional to work with a specific child as part of a private arrangement between the child's parent/guardian and the allied health professional. Any such visits will be at the discretion of the Nominated Supervisor and will only be allowed with prior approval. All visitors to the Service will need to sign into the service's visitor record and provide a copy of their Working With Children Check (blue card) before entry as this is a fundamental child safety requirement.

Inclusion Agency Engagement

The Service will seek to address any barriers for a child's participation through capacity building, where the service requires access to additional resources, support or training they will contact the relevant Inclusion

Agency (Inclusion Support Queensland) for professional support specifically to enhance our ability to provide a safe and inclusive environment for all children.

Parent/guardian permission shall be requested should the Service wish to make contact with the Inclusion Support Agency. This shall be in the format as required by the ISA.

Inclusion Support QLD (KU Children's Services) Contact Details

1800 811 039

inclusionsupportqld@ku.com.au

www.inclusionsupportqld.org.au

Strategic Inclusion Plan

Is an essential inclusion assessment and planning tool that outlines both short and longer term strategies for continually improving and embedding inclusive practice by the Service. The development of a Strategic Inclusion Plan assesses the service's current inclusive capacity and capability and outlines clear continuous improvement objectives for quality inclusion practices, with a strong focus on enhancing child safety and wellbeing for all.

The Strategic Inclusion Plan should be regarded as a 'living' document, actively implemented, regularly updated and reviewed within a 12 month period and be clearly reflected in the service's Quality Improvement Plan (QIP), demonstrating our ongoing commitment to safety and inclusion.

A Strategic Inclusion Plan should identify the:

- Barriers that significantly impact on the service's capacity to safely and effectively include children with additional needs. Barriers can be child specific such as behaviour or physical and social limitations; related to educator skills and training; issues with parents, including their expectations or difficulties in communication; related to the physical environment, or the program structure, or challenges in the supervision of all children
- Proposed strategies to actively address identified barriers to inclusion, with a primary focus on ensuring safety and promoting wellbeing, which may include (but are not limited to):
 - Changes to educator practices, planning, policy, physical environment and experiences to increase the safe participation of children with additional needs and embed inclusive practice in the care environment,
 - Inclusion related training, mentoring or coaching, or resources required by educators, specifically to enhance their capacity to support diverse children safely.
 - Developing policies and practices the service may use to proactively support future inclusion, with child safety as a focus
 - Identifying resources and support services in the local community to assist with the safe and effective inclusion of children with additional needs,
 - Developing a project to specifically support the safe inclusion of a child (or children) and build educator skills, knowledge and confidence in managing diverse needs.
 - Accessing the additional educator to increase educator to child ratios above the minimum requirements mandated in the National Regulations (or relevant state or territory legislation) where identified as required to ensure the enhanced safety and support of all children.

The SIP is reviewed on a periodic basis reflecting changes that have been applied through the implementation of the plan. Professional development is provided for educators to be informed, trained and supervised to implement the strategies identified in the SIP, ensuring that information is gathered and recorded for reflection on its effectiveness for the group and/or individual child.

Educator Training and Support

Appropriate ongoing and specialised training and support shall be provided for all educators to ensure continuity of care and commitment to inclusion with an emphasis on child safety and wellbeing. This may include external training on specific health and/or medical conditions, child protection, and trauma-informed practices, to ensure educators are fully equipped to create a safe and nurturing environment for every child.

Physical Environment

The indoor and outdoor environment and equipment will be thoughtfully designed or adapted/adjusted to ensure universal access and safe participation for all children, specifically supporting the inclusion of children with additional needs. Where relevant and appropriate for the service's specific environment, this may include the safe and effective use of:

- Portable ramps,
- Use of standing frames and support swings,
- Specialised furniture such as chairs, tables and positioning equipment,
- Communication charts and Auslan dictionaries to facilitate communication and empower children to express their needs and contribute to decisions about their safety.
- Resources and books in languages other than English to support indigenous children and children from linguistically diverse backgrounds, ensuring cultural safety and understanding for all children.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.166 Offence to use inappropriate discipline
 - s.166A Offences relating to inappropriate conduct
- **Education and Care Services National Regulations:**
 - R.155 Interactions with children
 - R.156 Relationships in groups
 - R.157 Access for parents
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety
 - QA3 – Physical Environment
 - QA4 – Staffing Arrangements
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Disability Discrimination Act 1992](#)
- [Anti-Discrimination Act 1991 \(Qld\)](#)
- [Inclusion Support Program Guidelines](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [1.1 Educational Program Development and Implementation](#)
- [1.3 Sharing the Program and Children's Progress with Families](#)
- [1.4 Excursions, Incursions and Regular Outings](#)
- [2.1 Providing a Child Safe Environment](#)
- [2.2 Supervision and Educator Ratios](#)
- [5.1 Interactions and Relationships with Children](#)
- [5.2 Positive Behaviour Support Practices](#)
- [6.1 Access for Families](#)
- [6.5 Interactions and Communication with Families](#)

Policy 5.4 Supporting Additional Needs with Inclusive Practices		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V2-03.2025 – Added additional information to policy statement, information added to all roles and responsibilities and added families. Added statements related to the Disability Discrimination Act, additional procedures relevant to enrolment, inclusion support practices, reasonable adjustments, NDIS plans, allied health professionals, Strategic Inclusion Plans and physical environment.		
V3-10.2025 – Updated policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

5.5 Promoting Protective Behaviours

Policy Statement

The Service considers its role in the active protection of children to be of paramount importance. We therefore take a proactive, comprehensive and preventative approach in supporting families and children through promoting protective behaviours and fostering a culture of safety to ensure children's ongoing physical and emotional safety, holistic wellbeing and protection at all times.

The Approved Provider also acknowledge responsibilities under the National Principles for Child Safe Organisations and Queensland's Universal Principle and Child Safety Standards to ensure that the safeguarding of all children in our care is the highest priority and forms the core of all service practices.

Roles and Responsibilities

Approved Provider	• Establish, implement and review effective policies and procedures that actively promote and embed the protective behaviours of children, ensuring they are practical and responsive to evolving safety needs. • Prioritise and invest in the continuous safeguarding of all children in our care through providing professional development, ongoing training and consistent support for educators in child protection and safe practices. • Actively foster and maintain supportive workplace cultures where the safety and wellbeing of children are consistently upheld as non-negotiable, and where staff feel empowered to raise concerns without fear.
Nominated Supervisor	• Provide clear, transparent, and sensitive communication to families on opportunities to engage with culturally competent protective behaviour strategies, ensuring information is accessible and understood by all. • Set and enforce the highest expectations for Educator conduct, ensuring all interactions and practices consistently maintain and enhance children's safety and wellbeing, aligning with established child protection frameworks.
All Staff	• Diligently follow all service policies and procedures specifically designed to promote children's development of protective behaviours, understanding their crucial role in creating a safe environment. • Immediately intervene to protect children whenever any potentially harmful or unsafe interactions, situations, or behaviours are observed or reported, taking decisive action to ensure child safety.

Procedures

Foundations of Protective Practices

Opportunities to incorporate protective behaviour messages will occur regularly within the program and also incidentally as the occasions arise, ensuring continuous reinforcement of safety concepts.

On induction, educators will be comprehensively instructed and trained on the key messages and skills communicated to children to support their ability to act protectively. Central to all promotion is:

- Children clearly understanding the fundamental concept of personal safety and the practical steps involved in keeping themselves safe in various situations.
- Children knowing precisely what to do and, crucially, who they can safely go to for help and support when they do not feel safe, are worried, or have experienced something that makes them uncomfortable.

Behaviours Promoted at the Service

The Nominated Supervisor and educators will actively and consistently reinforce the protective behaviours of children through the following core principles and clear, empowering messages:

- We all have the right to feel safe, secure and respected all of the time, regardless of where we are or who we are with.
- Nothing is so awful, embarrassing, or confusing that we can't talk to a trusted adult about it. Our feelings and experiences matter, and we deserve support
- Encouraging children to interact and/or physically touch other children in a safe, respectful and non-threatening way, always respecting personal boundaries.
- Guiding children in building appropriate emotional and physical boundaries with peers and adults, teaching them to recognise and communicate when their boundaries are being crossed.
- Building on children's problem solving, reasoning and communication skills through practical application (e.g. brainstorming safe strategies for potentially unsafe or uncomfortable situations), empowering them to think about their safety .

The Nominated Supervisor and educators will proactively and intentionally create opportunities to build children's personal safety behaviours/strategies, fostering their resilience and self-protection skills including:

- Regular discussions and practice opportunities while they are playing and interacting within their environment, making safety a natural part of their experiences.
- Teaching strategies for safely accessing their community and understanding appropriate behaviour in public spaces.
- Developing a strong understanding of privacy and personal boundaries, empowering children to assert their right to personal space and feel safe in their bodies.
- Clearly identifying and reinforcing who children can go to for help when feeling unsafe, uncomfortable, or worried, ensuring they have a network of trusted adults.

The Nominated Supervisor and educators will actively collaborate with families to consistently support children's learning about personal safety and uphold a culturally competent and respectful approach, recognising diverse family values regarding safety and communication. Collaboration will include the Service proactively liaising with school administration to maintain a clear awareness of additional protective behaviour programs provided within the school setting, ensuring a consistent and reinforcing message about safety for children.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.155 Interactions with children
 - R.156 Relationships in groups
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities

Additional Regulatory Context and Guidance

- [Child Protection Act 1999 \(Qld\)](#)
- Queensland Government [Statement of Shared Commitment](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)
- [National Principles | Child Safe Organisations](#)

Related Policies and Procedures

[1.1 Educational Program Development and Implementation](#)

[1.3 Sharing the Program and Children's Progress with Families](#)

[2.1 Providing a Child Safe Environment](#)

[5.1 Interactions and Relationships with Children](#)

[6.5 Interactions and Communication with Families](#)

Policy 5.5 Promoting Protective Behaviours		
Version and reason for change	Date Implemented	Date of Review
V1-10.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V2-03.2025 – Added additional information to policy statement, information added to all roles and responsibilities and added reference to Statement of Shared Commitment.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

Policy Group 6

Collaborative Partnerships with Families and Communities

Quality Area 6 focuses on **supportive, respectful relationships with families** which are fundamental to achieving quality outcomes for children. Community partnerships that are based on active communication, consultation and collaboration also contribute to children's inclusion, learning and wellbeing.

When our service engages well with the community we build trust – which is a fundamental element for partnerships. A collaborative relationship between parents and the service enhances children's learning and play.

As a service we seek to showcase our value of diversity and inclusion. When services are connected with families and communities from a range of cultural backgrounds, they can better understand and respect the diversity of the children in their care.

Children thrive when they belong to a community, connections with families creates a sense of community within the education and care service. When families and communities are involved, they can create a supportive environment for the children, staff, and families, which can contribute to the overall well-being of everyone involved.

6.1 Access for Families

Policy Statement

The Service is committed to providing safe, equitable, and culturally safe access to education and care for all eligible school-age children. Our primary focus is to meet the needs of families who are working or studying, with a preference for children attending the local school. As a service guided by child safe standards and practices, we will ensure our enrolment and waiting list procedures prioritise the safety and wellbeing of all children. The service is non-discriminatory and provides education and care to children and families irrespective of their background, culture, ability, religion, gender identity, sexual orientation, marital status, or socioeconomic status.

The Service will work collaboratively with families to understand and cooperate in planning to meet the diverse needs of children intending to enrol in the service, with a specific focus on cultural safety. All members of the community, including children, will receive respectful and culturally appropriate interactions with all service employees and the Approved Provider.

The Service will give highest priority to children and families who are vulnerable or at risk of serious abuse or neglect, in accordance with our primary duty of care to children's safety and wellbeing.

Roles and Responsibilities

Approved Provider	Establish transparent and equitable procedures to support fair access for families with a clear focus on child safety and cultural safety,
Nominated Supervisor	- Liaise with parents/guardians to collate enrolment and waitlist information. - Manage any potential waiting list, including communication with families and prioritising access based on the child's safety and wellbeing needs.

Procedures

Priority of Access and Waiting List

While we have flexibility in filling vacancies, our policy is developed with a clear framework that prioritises the most vulnerable children. The service's priority of access is guided by our commitment to child safety and wellbeing, cultural safety and Child Safe Standards.

A waiting list will be created where demand for places provided by the Service exceeds those available. In this instance a waiting list will be managed by the Nominated Supervisor (or relevant delegate). The priority of access will be given based on the following:

- First priority is given to children at risk of serious abuse, neglect, or harm, as this is our most critical duty under the Child Safe Standards.
- Second priority is given to families where the working or study needs of parents/guardians require the provision of care. This includes a child of a sole parent/guardian, or children whose parents/guardians both satisfy the activity test through paid employment.
- Third priority is given to students attending the local school, to support the local community and school partnership.

Upon enrolment, parents/guardians will be informed of their priority and if the Service has no vacancies, their child will be allocated the lowest priority of access as per the guidelines above. In rare circumstances, it may be required to alter priority and therefore a child may be required to leave or reduce their days in order to accommodate for children with higher priority. Any decision to alter a child's priority or request a family to leave will be made in consultation with all parties and with the child's best interests as the paramount consideration.

Any family requested to leave or reduce their days of care will be provided with written notice of the need, at least 14 days prior to the identified date.

Our aim in using the above guidelines are as follows:

- To ensure a fair, transparent and child focussed process for managing a waiting list and determining a parent/guardian's priority of access status,
- To provide a process for allocating limited places equitably,
- To provide a high quality service that promotes child safety and wellbeing, and cultural safety for all children in our School community.

Waitlist Guidelines and Implementation

Waiting lists will be maintained for permanent places when the program has reached daily maximum capacity and there is demand for places throughout the year.

Parents/guardians will be requested to place their details on the Service waiting list through their childcare management software parent portal. Upon doing so, parents/guardians will receive a notification email confirming their needs.

The Nominated Supervisor will provide information to parents/guardians about the position on any waiting list when requested. Parents/guardians on the waiting list will be contacted as places become available and an offer made.

If the offered place is declined, that place will then be offered to the next parent/guardian on the waiting list. Parents/guardians will be given two opportunities to decline offers before being removed from the waitlist.

Parents/guardians wishing to accept an offer but are unable to attend the booking until a later date, must contact the Nominated Supervisor. Families may be required to pay for that place until attendance is started in order to secure that booking.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations**
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA6 – Collaborative partnerships with families and communities

Additional Regulatory Context and Guidance

- [A New Tax System \(Family Assistance Administration\) Act 1999](#)
- Department of Education - [Child Care Provider Handbook](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[6.2 Enrolment and Orientation](#)

[6.3 Bookings and Cancellations](#)

[6.4 Acceptance and Refusal of Authorisations](#)

[6.5 Interactions and Communication with Families](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.5 Governance and Management](#)

Policy 6.1 Access for Families		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V2-03.2025 – Added additional information to procedures relevant to wait list guidelines and implementation.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

6.2 Enrolment and Orientation

Policy Statement

The Service's primary duty is to ensure the safety, well-being, and cultural identity of every child in our care and our enrolment and orientation processes are a critical first step in fulfilling this responsibility. The Service is committed to gathering comprehensive, accurate, and relevant information about each child's specific needs, including health, developmental stage, and cultural background, to provide high-quality education and care.

The Service recognises that a welcoming and culturally sensitive orientation process is a critical step in building a strong, collaborative partnership with families. This partnership is based on mutual respect and open communication, ensuring families feel valued and confident in our ability to care for their child. The Service is committed to making our service accessible to all children, including those with disabilities. We will liaise with families and other health professionals to make reasonable adjustments to our programs and environment to ensure every child can participate fully and safely.

Accessing our Service is a two-part process, complemented by the opportunity to access Child Care Subsidy payments for eligible families. Families complete a comprehensive enrolment form, providing us with the necessary information to ensure their child's safety and well-being. Finalised enrolment is mandatory before any care can be provided.

Once enrolled, families can book their required sessions of care. While booking requests may be submitted alongside enrolment, they are two distinct processes therefore care cannot commence until the enrolment is complete and all required information and authorisations are verified.

Roles and Responsibilities

Approved Provider	• Ensure enrolment records are up to date for each child and includes the information required by Regulations • Ensure all necessary authorisations are signed by the child's parent/guardian and/or other authorised nominee • Ensure enrolment and orientation procedures are inviting and provide key information to new families including policies related to child safety and cultural competence. • Families of children with disability will be supported to access and participate in the program and environment through making reasonable adjustments where necessary • Ensure a child with medical needs does not begin at the Service until a current medical management plan is received and necessary medication is provided to the service. • Use feedback and complaints as a tool to continuously improve our enrolment and orientation procedures.
Nominated Supervisor	• Be the primary contact for new enrolments, providing clear information to parents/guardians exploring OSHC services. • Ensure all health and Medical Action Plans and Administration of Medication forms are completed (where relevant) • Share the Medical Conditions Policy with families of children with a specific health care need, allergy or other relevant medical condition before the child starts care with the Service • Develop Risk Minimisation Plans and Communication Plans with parents/guardians for children with medical needs before the child starts care with the Service • Inform all Educators of new children's individual needs including any medical conditions, cultural considerations, developmental needs, interests and strengths • Facilitate a re-enrolment process each year, to ensure all families information remains current

	- Collaborate with the Approved Provider to enhance orientation practices, based on feedback received, ensuring they are culturally responsive and prioritise safety. - Barriers to access and participation for children with disability are identified and reasonable adjustments to the program and environment are made to allow access and participation in the Service - Ensure a child with medical needs does not begin at the Service unless a medical management plan is received and medication is provided to the service - Ensure the child's medical management plan is recorded, and this information is shared with and distributed to Educators
Responsible Person in Charge	- Be familiar with key information in each child's enrolment form, understanding it's importance for their daily care and wellbeing. - Uphold the privacy and confidentiality of all enrolment information. - Actively support children's orientation of the service prior to or on their first arrival, ensuring they feel safe, secure and welcome.
All Staff	- Access enrolment information as needed to provide safe and personalised care and education to children accessing the service. - Actively support the orientation of new families by engaging in welcoming, respectful and culturally responsive communication. - Work collaboratively with culturally and linguistically diverse children and parents/guardians to build culturally safe and secure environments.
Families	- Complete all enrolment documentation accurately and provide all necessary authorisations required by the Service for enrolment. - Confirm enrolment notices and bookings through myGov - Liaise with Centrelink in relation to Child Care subsidy entitlements. - Notify the service of any specific health care needs of the child, including medical conditions and allergies and provide a current medical management plan (if applicable) - Ensure all information about the child and family is kept up to date, especially regarding emergency contacts and health information.

Key Tasks and Responsibilities

Managing Enquiries	The Nominated Supervisor will communicate the enrolment procedures and requirements to families.
Enrolment acceptance	The Nominated Supervisor will review enrolment information and assess the need for additional information and supporting documents. Once the Nominated Supervisor is satisfied of the service's capacity to care for the child and all relevant information is submitted, they can communicate acceptance to the parents/guardians.
Orientation	The Nominated Supervisor will implement an appropriate orientation process which includes the provision of a Family Handbook to inform families of the service's policies and procedures, and key practices related to their child's participation and engagement in the service.
Record Keeping	The Nominated Supervisor is responsible for securely managing the collection, storage and maintenance of all enrolment records. This includes authorisations and health information which are essential for safeguarding children's wellbeing.

Procedures

OSHC Enquires

The Nominated Supervisor is the key contact for parents/guardians interested in accessing and enrolling into the Service.

All new parents/guardians and families are able to request a tour of the Service where the Nominated Supervisor or delegate will discuss the Service's operations and program before commencing care. This initial meeting is an opportunity to discuss our program and, importantly, to listen to and understand each family's unique cultural background and needs, ensuring a culturally safe and inclusive start for every child.

Families wishing to enrol their child/ren into the Service will be provided with a copy of the *Family Handbook*, which outlines key information for families when using the Service. This handbook explicitly details our policies and practices related to child safety and wellbeing and cultural safety. Additionally, families will be provided with information on how they can begin the enrolment process.

Enrolment at this Service for children over prep age (but not yet started prep) is available from the beginning of the calendar year in which they will attend school. Families may need to provide documentation relating to proof of age prior to enrolment being accepted to ensure we can provide age-appropriate care and maintain optimal safety and supervision.

During term time, the Service accepts enrolments of school-aged children between prep and year 6 who are enrolled and attending the School. Parents of children attending another school will need to make their own transport arrangements for their child to attend the service.

During vacation care, the Service accepts enrolments of school-aged children between prep and year 6, and up until such time as the child starts high school. Children do not have to be enrolled and attending the School to attend our vacation care program.

Applying for Service Enrolment

The enrolment process will commence when a new family completes an enrolment form through the Service's online childcare software management system. This secure system is designed to protect all sensitive family and child information. Support will be provided to families from culturally and linguistically diverse (CALD) backgrounds to assist in completing forms and applications to Government agencies as required.

Once the enrolment form is submitted, an automatic email is sent to the Nominated Supervisor for review, with a focus on ensuring the Service can meet the child's individual safety, wellbeing and cultural needs. The Nominated supervisor will then contact the family and organise an initial meeting where the family will be provided with a tour of the service.

The enrolment records will contain the following information:

The enrolment form must be completed in full and contain the following for each child being educated and cared for. Details to be completed are:	
☐ Full name, date of birth and address of the child, ☐ Gender of the child	
☐ Name, address and contact details of:	☐ each known parent of the child ☐ any person who is to be notified of an emergency (if any parent cannot be immediately contacted) ☐ any person who is an authorised nominee ¹ ☐ any person who is authorised to consent to medical treatment or medication
☐ Details of any court orders, parenting orders ² or parenting plans ³ relating to powers, duties, responsibilities or authorities of any person in relation to the child or access to the child; or ☐ Details of any other court orders relating to the child's residence or the child's contact with a parent or other person;	
☐ Language used in the child's home ☐ Cultural background of the child and, if applicable, the child's parents	
☐ Any special considerations for the child, for example any cultural, religious or dietary requirements or additional needs ☐ Details of any dietary restrictions for the child	

☐ Health and medical information including (regulation 162): • The name, address and telephone number of the child's registered medical practitioner or medical service; and ☐ if available, the child's Medicare number;
☐ Any medical management plan, anaphylaxis medical management plan or risk minimisation plan to be followed with respect to a specific healthcare need, medical condition or allergy referred to above • specific healthcare needs of the child, including any medical condition; and • allergies, including whether the child has been diagnosed as at risk of anaphylaxis
☐ The immunisation status of the child ⁴ .
Agreement to the terms and conditions of enrolment, including authorisation for the staff to: ☐ Administer first aid, ☐ Obtain medical treatment from a medical practitioner, hospital or ambulance, ☐ Transport a child by an ambulance, ☐ Any regular outings, ☐ Apply/assist to apply SPF+30 sunscreen, ☐ Take and/or display children's photographs/videos, ☐ The opportunity to access the service's policy and procedures.
¹ Authorised nominee - means a person who has been given permission by a parent or family member to collect the child from the education and care service ² Parenting Order - means a parenting order within the meaning of section 64B(1) of the <i>Family Law Act 1975</i> ³ Parenting Plan - means a parenting plan within the meaning of section 63C(1) of the <i>Family Law Act 1975</i> and includes a registered parenting plan within the meaning of section 63C(6) of that Act. ⁴ Sighting Health Record - where a staff member has sighted a health record, a notation of the sighting.

Once enrolment is complete, families will be provided with access to information via the Service's childcare management software program, which includes but not limited to:

- Family Handbook, which outlines the Service's operation and philosophy
- Current fee structure and payment details
- Child Care Subsidy information
- information on the National Quality Framework and My Time Our Place learning framework

All information obtained through the enrolment process will be kept in strictest confidence and used only for the purposes for which it is obtained (refer policy [7.6 Privacy and Confidentiality of Records](#)).

The enrolment form shall also include the written consent of the parent/guardian signing the form to the use of the information by the Service in keeping with policy [7.6 Privacy and Confidentiality of Records](#) and the other Policies and Procedures of the Service from time to time.

As part of the enrolment process, all parents/guardians wishing to access care must provide direct debit details via the relevant childcare management software to allow fees to be drawn as required.

The Nominated Supervisor will ensure:

- The enrolment form is completed accurately and, in its entirety,
- The direct debit details forms are completed,
- The family's enrolment is lodged with Centrelink,
- A family file is created.

Accepting An Enrolment

A child's enrolment **cannot be accepted** unless all relevant information (as outlined above) is completed in full by parents/guardians.

Prior to accepting an enrolment, the Nominated Supervisor will consider relevant information, including-

- Consideration of any priority of access or waiting list.

- The capacity and resources available to provide for the child's safety, wellbeing and cultural safety.
- The information relevant to the service's Infectious Disease policy and the child's immunisation status.
- Submission and refusal of authorisations as set out in the Acceptance and Refusals of Authorisations policy

Additional Health or Medical Needs

Where enrolment records indicate a child has a relevant health or medical condition, the Nominated Supervisor is to contact **parents/guardians** to coordinate obtaining/creating relevant plans as set out in policy [2.9 Medical Conditions in Children](#) (management, risk-minimisation and communication plans).

Once the Nominated Supervisor is satisfied all enrolment information is submitted and the service can safely and adequately educate and care for the child(ren), parents/guardians will be informed of the accepted enrolment via email. Typically, confirmation of bookings is acknowledged concurrent with enrolment and communication will confirm the child's first attendance.

Any child requiring life-saving medication, as specified in their enrolment form (e.g., EpiPen, asthma medication), is required to have all relevant medications clearly documented in their Medical Action Plan, as prescribed by a registered medical practitioner. This medication must be made available at the Service at all times when the child is in care.

Authorisation to take and/or display children's photographs and/or videos

Through the Service's enrolment process (on relevant enrolment forms and documentation), parents/guardians shall be required to authorise permission for such images of their children to be taken and used by the Service. This consent process will be explained clearly to families, detailing the purpose and potential audience for any images or videos. Parents/guardians shall also be informed of the procedure for processing and/or storage of any such photographic images.

Such permission shall explicitly include consent for images and videos to be used for general purposes, such as local community and in-service activities and events. Families will be provided with a consent form that allows them to specify their preferences and opt-out of certain types of image use, in accordance with the National Model Code of Practice.

Parents/guardians shall be requested for special permission to be granted for photographs taken which are intended to be used for broader, external promotional purposes and may be viewed by persons outside of the local community where the Service resides. This separate, specific consent will be sought on a case-by-case basis.

Employees of the Service shall only be permitted to photograph children using equipment owned solely by the Service. This ensures the security and appropriate use of all photographic and video content. All staff will be trained on the safe and respectful use of images and videos and will adhere to strict privacy protocols.

Parents/guardians are required to provide written notification to the Nominated Supervisor if they do NOT want their child to be photographed or their photo published in any form. Parents/guardians also have the choice to withdraw consent for their child/ren to be photographed or filmed in certain circumstances. A record of all children who are NOT to be photographed will be developed, maintained and shared with educators and staff. This record will remain private and confidential to Educators and staff only.

Court Orders, Parenting Orders or Parenting Plans

Through the Service's enrolment process, parents/guardians shall be required to provide current copies of any parenting plans and court orders which may impact on the Service ability to implement a duty of care. This is critical for ensuring the safety and legal rights of the child are upheld.

The Service shall request that all families, upon changing circumstances within the family unit, update their enrolment and provide certified copies of any parenting plans and court orders which may impact on the Service to implement a duty of care.

The Service shall inform all employees of the intent of the parenting plans and/or court orders whereas it applies to them and impact on their capacity to manage their own duty of care and that of the Service

towards the child/ren and family. Staff are required to maintain strict confidentiality regarding this information.

Families with children attending the Service who have parenting plans or court orders in place are responsible for ensuring they comply with these requirements. The Service shall endeavour to release children within the conditions as outlined in these documents and orders. However, should the safety and wellbeing of other children or educators be at risk, children will be released and the custodial parent and/or police contacted immediately.

Information requested by parents/guardians relating to a child under a court order or parenting plan will be subject to the conditions as per the court order/parenting plan.

Conditions of Enrolment

The conditions of a family's enrolment with the Service are structured to safeguard the child and foster a supportive and transparent partnership between the service and the family. Continued enrolment is subject to adherence to relevant conditions, including but not limited to—

- Supply of relevant information and authorisations, and
- Following the policies of the service, including—
 - payment of fees,
 - observing operational hours and communication requirements,
 - respecting protocols for sick children, and
 - the behaviour of children and parents/guardians.

The Service will, on an annual basis, request families to update children's enrolment information to ensure all parent/guardian and emergency contact information is current. This is a vital component of our commitment to child safety, ensuring we can contact the right people in an emergency.

Educators are welcome to enrol their child at the Service however, if an educator is terminated from their position for any reason, the Service reserves the right to terminate the child's position due to conflict of interest.

An enrolment will automatically end for Child Care Subsidy purposes if a child does not attend a session of care at the Service for 14 continuous weeks. This is a rule set by CCS and the Department of Education. For further information refer to the Child Care Provider Handbook.

Annual Re-Enrolment

Prior to the end of each year, families will be provided with a letter to confirm their child's continuing enrolment for the following year. Failure to respond in writing may result in their child not being considered for a continued enrolment. Families who require changes to their hours of care must indicate new times, days etc during the re-enrolment process.

Families eligible for CCS are responsible for ensuring that all information requested by Centrelink is provided to them in order to ensure no interruption to CCS payments

Cancellation of Enrolment

Where a family does not adhere to the above conditions of enrolment, the Service may suspend or cease enrolment. Any decision to suspend or cease enrolment is treated seriously and will be provided in writing, including setting out any matters required for re-enrolment.

Where a family with a permanent booking chooses to cease their enrolment with the Service a minimum of two (2) weeks' notice in writing is required prior to the child/ren leaving the service. Families with permanent bookings who want to reduce their booked days must provide one (1) weeks' notice in writing prior to reducing the number of days of attendance.

Written notification regarding cancellation of care must state:

- the date they are writing the withdrawal notice and

- the child's last day of attendance

Written withdrawal notification can be emailed to the service or handed to Management. This letter will be placed into the child's file and archived once they have left the Service. In accordance with policy [7.10 Fees, Statements and Parent Gap Fee Payments](#), fees will be charged up to the end of the two weeks from the date at which notice was received in writing, whether or not the child has attended the Service during those two weeks.

If the child does not attend during their two weeks of notice, Child Care Subsidy (CCS) will not be paid after their last day of attendance (including if the child does not attend on their last day) and full fees will be applicable (This is a policy of the Family Assistance Office in relation to Child Care Subsidy).

Termination of Enrolment

The Service have a legal duty to ensure the health, safety and wellbeing of children, educators, families and volunteers at our OSHC Service. To promote respectful and effective partnerships with families, we ensure that each child and family participate in a comprehensive induction including detailing our terms of enrolment, as per our legal agreement, which advises families on the Services' right to terminate a child's enrolment if a service policy has been breached.

In addition to the conditions of enrolment detailed above, this may include:

- failure to comply with the enrolment contract
- bullying, disparaging or hurtful behaviour by a child or family member that continues even with parent/guardian collaboration in stopping the behaviour
- non-payment of childcare or late fees and/or recurring late payment of fee
- continuing to pick up the child past the required licensed time following multiple warnings
- inability to meet the child's needs without family support and commitment to ensure their child receives the best possible support within our Service
- bullying and/or harassing OSHC educators, children or other families enrolled at the Service

The Approved Provider or Nominated Supervisor will advise families in writing that their child's enrolment will be terminated following all attempts to rectify any non-compliance. Two weeks' notice will be provided to families, unless the physical or psychological safety and wellbeing of other children, educators or other families are at risk. In this case, an immediate termination of enrolment may apply.

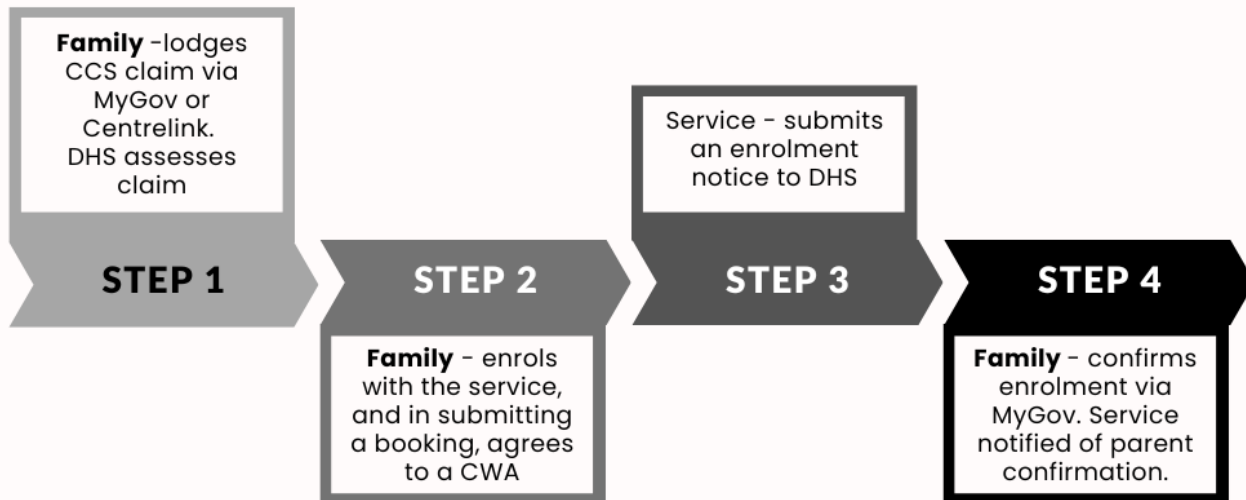
Any outstanding fees will be provided to families and remain due to be paid upon termination of enrolment. The initial Bond payment made on enrolment will not be refunded until any outstanding fees are paid. Refer policy [7.10 Fees, Statements and Parent Gap Fee Payments](#).

Child Care Subsidy Enrolment (CCS Claim)

It is the responsibility of the parents/guardians to make a claim for CCS. The claim for CCS is initiated via either MyGov or Centrelink. Further information and guidance about submitting a CCS claim can be found at the Services Australia website

The process for making a CCS claim involves communication between the family, the service and Centrelink/Department of Human Services. To ensure funds are applied in a timely manner, it is important parents/guardians respond to relevant communication.

CCS Enrolment Procedure



Completing the Complying Written Arrangement (CWA) is a critical step and is the agreement on the pattern of care booked. The date the CWA is agreed to will be the start date of CCS enrolment. Once the CWA is signed, the enrolment will need to be confirmed through MyGov as well.

Where there are changes (to fees or booked days) to the individual Complying Written Arrangements (CWA) for care between the Service and a parent/guardian, the Service will update the arrangement in writing, and parents/guardians may be required to confirm the changes by signing/accepting the updated CWA through their MyGov account.

Families can apply for ACCS (grandparent), ACCS (temporary financial hardship) or ACCS (transition to work) through Centrelink directly. The Service can apply for ACCS (child wellbeing) directly through the CCS software or PEP for children identified at risk of serious abuse or neglect. The Service will ensure all ACCS applications are managed in line with the Guide to Additional Child Care Subsidy (child wellbeing) and Child Care Provider Handbook. Refer policy [7.11 Child Care Subsidy \(CCS\) and Additional Child Care Subsidy \(ACCS\) Management and Compliance](#).

Entitlements and details of absences are set out in the family's statement (refer policy [7.10 Fees, Statements and Parent Gap Fee Payments](#))

Record Keeping and Confidentiality

All enrolment records will be stored securely as outlined in policy [7.6 Privacy and Confidentiality of Records](#). All information is only to be used for the purpose of which it is obtained, which is to ensure the safety, wellbeing, and culturally responsive care of each child. Parents/guardians may access their enrolment information at any time however, the service is committed to protecting the privacy of all children and families in accordance with legal and ethical obligations.

Service Orientation

Consideration will be made to each family regarding the initial settling in period and strategies may be offered to assist in this transition, for example, organising a buddy in the same class to remind the child to attend OSHC on that particular day; notifying the child's classroom teacher that the child will be beginning OSHC on certain days. This process is designed to be culturally sensitive and responsive to the individual needs of each child and family.

Understanding of the service's environment, routines, care and education practices are important for new families to develop. When a new enrolment is accepted, parents/guardians should familiarise themselves

with the Family handbook. Should the parents/guardians wish to visit the service, the Nominated Supervisor will coordinate a suitable time. During a visit to the Service educators will—

- explain the routine and program, emphasising the importance of child-led play and safety protocols,
- indicate key facilities like toilets, bag racks, hand washing basins etc. and ensure children know how to safely access them,
- explain the roles and responsibilities communicating with the service and collecting children,
- discuss any medical or additional needs, and/or individual considerations to support the child, including any specific cultural or language needs to ensure a sense of belonging,
- answer any questions or concerns, including those related to child safety and our complaints-handling process.

Families will be provided with an outline of the Service policies which will include key policies such as: Fees and Statements, Sun Safety, Incident, Injury, Trauma and Illness, Infectious diseases and Administration of Medication. Families will also be shown the electronic signing in and out process.

During a child's first attendance at the Service the Nominated Supervisor/Responsible Person in Charge will sensitively support and welcome the child and take time to demonstrate the service's expectations, routines and facilities (including access to toilets, personal items, food, water etc.) in a manner that reflects the child's needs. This may be completed in large groups, such as at the start of the year with a new cohort of younger children.

The Service recognises that starting at OSHC can be a significant step for some children. In acknowledging children wellbeing, an important orientation step will be showing children who they can approach and talk to if they have a concern or question (typically the Nominated Supervisor or Responsible People). This is a critical aspect of empowering children to feel safe and to know they will be heard. All educators will ensure children are supported and welcomed, especially as they develop their engagement and orientation into the service.

Educators will endeavour to develop responsive and respectful relationships with new children through regular and genuine interactions and conversations. Educators will talk to children about their interests and seek their suggestions for activities they would like to be involved in. This practice is essential for building trust and ensuring the program is culturally relevant and promotes a sense of belonging for all children.

Once the child has attended the Service for a few days, educators will ensure they:

- Speak directly with the family to ask how their child and the family has settled into the before and/or after school care routine,
- Welcome any questions or concerns the family may have,
- Provide information to the family of how their child has settled in these early days (interests, friends, games they enjoy playing, craft activities etc.),
- Request families to offer suggestions of how the oshc service could improve the orientation process.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.167 Offence relating to protection of children from harm and hazards
 - s.171 Offence relating to direction to exclude inappropriate persons from education and care service premises
 - s.175 Offence relating to requirement to keep enrolment and other documents
- **Education and Care Services National Regulations:**
 - R.77 Health, hygiene and safe food practices
 - R.78 Food and beverages
 - R.88 Infectious diseases
 - R.90 Medical conditions policy
 - R.91 Medical conditions policy to be provided to parents
 - R.92 Medication record
 - R.157 Access for parents

- R.160 Child enrolment records to be kept by approved provider and family day care educator
- R.161 Authorisations to be kept in enrolment record
- R.162 Health information to be kept in enrolment record
- R.168 Education and care service must have policies and procedures
- R.170 Policies and procedures to be followed
- R.171 Policies and procedures to be kept available
- R.172 Notification of change to policies or procedures
- R.177 Prescribed enrolment and other documents to be kept by approved provider
- R.181 Confidentiality of records kept by approved provider
- R.183 Storage of records and other documents
- **National Quality Standard, Quality Areas:**
 - QA2 – Children’s health and safety
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- Department of Education - [Child Care Provider Handbook](#)
- [Privacy Act 1988 \(Cth\)/ Information Privacy Act 2009 \(Qld\)](#)
- [Disability Discrimination Act 1992](#)
- [Family Law Act 1975](#)
- [A New Tax System \(Family Assistance Administration\) Act 1999](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)
- [National Model Code Taking Images and Videos.pdf](#)

Related Policies and Procedures

[6.1 Access for Families](#)

[6.3 Bookings and Cancellations](#)

[6.4 Acceptance and Refusal of Authorisations](#)

[6.5 Interactions and Communication with Families](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.5 Governance and Management](#)

[7.6 Privacy and Confidentiality of Records](#)

[7.10 Fees, Statements and Parent Gap Fee Payments](#)

[7.11 Child Care Subsidy \(CCS\) and Additional Child Care Subsidy \(ACCS\) Management and Compliance](#)

Policy 6.2 Enrolment and Orientation		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Address regulatory changes		
V2.-06.2024 – Additional procedures relevant to photographs/videos of children, court orders/parenting plans		
V3-03.2025 – Added additional information added to AP, NS, Educator and Family roles and responsibilities. Added additional procedures relevant to conditions of enrolment, annual enrolment, cancellation of enrolment, termination of enrolment and service orientation.		
V4-10.2025 – Updated policy statement, enhanced roles and responsibilities, enhanced key tasks and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V4-04.2026 – No updates		

6.3 Bookings and Cancellations

Policy Statement

The Approved Provider is committed to delivering an efficient and effective service for children and families. Management of bookings and cancellations is critical in providing a quality and efficient OSHC service for the School community. Parents/guardians and families have a role in communicating bookings and cancellations with the Service to ensure children's safety is prioritised and effective business practices are supported. The Service will ensure the booking administration meets the needs of families through effective communication of clear processes and expectations.

Roles and Responsibilities

Approved Provider	• Ensure administration practices support the provision of safe, culturally responsive and high quality care, including compliance with law, regulations and CCS obligations.
Nominated Supervisor	• Provide effective communication to families to ensure their responsibilities and obligation in notifying the service of any changes that may impact a child's safety and wellbeing. • Monitor and support the application of the service's fees and booking management procedures.
All Staff	• Support the administration of bookings and cancellation, including documenting notification as required and immediately reporting any concerns about a child's absence that may pose a risk to their safety.
Families	• Use the designated parent portal or app to manage bookings and cancellations whenever possible to ensure accurate and timely communication. • Ensure all contact information and authorised nominee details are kept up-to-date for communication in emergencies. • Adhere to all service policies and procedures, including those related to bookings, cancellations, and fee payments.

Procedures

A child must be fully and actively enrolled at the Service before any requests for booking can be processed or accepted (refer policy [6.2 Enrolment and Orientation](#)). This includes:

- Enrolment paperwork completed in full,
- Relevant supporting documentation (including but not limited to, medical information/action plans, inclusion support plans and immunisation records) provided to the service which are essential for providing safe and inclusive care,
- Parents/guardians are made aware of the service policies and procedures and have been provided with appropriate information in respect of the booking processes.

Bookings are required by all parents/guardians who seek to use the service on a Permanent (routine) or casual basis. A permanent booking shall be defined by a regular pattern of attendance throughout each term on one or more occasion per week. This pattern of attendance is expected to remain unchanged for the duration of the term, with the understanding that permanent bookings are weekly bookings, ensuring the same days and times are reserved on a recurring basis each week.

Authority to Book Care

Bookings can be made by the account holders (typically the child's parents/guardians) or, where consent has previously been obtained, an authorised nominee. The Service cannot make a booking to an account where proper authority has not been provided.

Annual Booking Procedure

At the end of each calendar (school) year, the Service will manage permanent bookings for before and after school care:

- Routine bookings for before and after school care will NOT roll over. Families will be required to complete a new booking form each year, details of which are sent out in term 4 annually.
- All families should be requested to update their enrolment information at the beginning of a new school year.

Before and After School Care

Permanent Bookings

Bookings for Before and After School Care session can be made by the account holders (typically the child's parents/guardians) or an authorised nominee, where consent has previously been obtained. Where the service has reached or exceeded requests for bookings beyond the maximum number of children stipulated in the service approval the procedures outlined in policy [6.1 Access for Families](#) (management of waiting lists) will be followed.

Care needs for those parents/guardians that work a rotating roster

Parents/guardians with shift-working employment can have their needs addressed on a case-by-case basis. Parents/guardians with these circumstances will need to liaise with the Nominated Supervisor to negotiate this arrangement. Evidence (e.g. a copy of working roster) will be required when requested by the service. Bookings of this nature are considered a permanent booking. Therefore, these arrangements have the same conditions as permanent bookings.

Changes to Permanent Bookings

- Any changes to bookings will require notice of at least **two weeks** (14 days), any notice that is less than two weeks will incur the regular fee.
- All changes must be requested **in writing** and will be acknowledged and confirmed by the service.

Casual Bookings

- Casual bookings will only be available where the Service has approved places available. Permanent bookings will take a priority over casual vacancies.
- Casual booking requests may be made over the phone or in person however they must be followed up **in writing**.
- If there is no casual placement available at the time the request is made, the request will be placed on a waiting list. An offer of placement may be made if a casual position becomes available closer to the requested date.

Cancellations (Advising of Absences)

Should the child not attend a booked (either permanent or casual) OSHC session for any reason, fees for the session are still payable. CCS will apply in accordance with allowable and additional absence provisions.

It is the responsibility of parents/guardians (account holders) to advise the Service of absences for any reason. Families are requested to manage all bookings and cancellations through their childcare software parent portal or App. If a message is received via the child, the parent/guardian will be contacted to confirm the change of arrangements.

It is preferred that cancellations are notified through the Parent portal/App or in writing. Parents/guardians (or authorised nominees) should notify the service before the sessions of any planned absences.

Notification of a child's absence can be made via:

- Parent portal/App,
- Phone,
- Email,
- In-person,

If the child's booking hasn't been cancelled and/or the Service hasn't been notified of the child's absence, a parent/guardian and/or authorised nominee will be contacted to ensure the child is accounted for. This is a critical child safety procedure. If contact cannot be made, further actions will be taken in line with our missing or unaccounted for procedures as set out in policy [2.3 Safe Arrivals and Departures of Children](#). A

non-cancellation fee will be charged in addition to the regular fee for that session as per policy [7.10 Fees, Statements and Parent Gap Fee Payments](#).

All fees associated with routine bookings, should the child not attend care due to illness or for any other reason, will be required to be paid in full. CCS entitlement may still apply, depending on factors such as CCS enrolment, allowable absences and or reason for absence.

Permanent Cancellation of Care

Families are required to give a minimum of two weeks' notice, in writing, to advise the Service of the permanent cancellation of their booking.

Outstanding balances of the family account will be managed in accordance with policy [7.10 Fees, Statements and Parent Gap Fee Payments](#).

Vacation Care and Pupil Free Days

Program and Forms

Vacation Care bookings can be made using the relevant booking form

Pupil Free Day bookings will have individual booking forms (when offered). The planned program and relevant information will be attached to booking forms. Details including fees, timelines for booking, and session capacities will be noted on the program/form. Unless stated otherwise, Pupil Free Days will have the same conditions as vacation care.

All vacation care bookings will be confirmed via the app as soon as possible. In the event that a requested day is not available, the family will be notified and given the option of going on a waiting list for that session. An offer of placement may be made if a position becomes available closer to the requested date.

All vacation care bookings close two weeks prior to the date of the scheduled holiday program. No bookings will be accepted after that time.

Vacation Care Cancellation and Changes to Bookings

Cancellation and changes to bookings for Vacation Care must be made **via email** at least **2 weeks** (14 days) before the closing date for a specific holiday program. Cancellations outside of this timeline will incur a fee, equal to the fee for that session. No changes to vacation care bookings are permitted within two weeks of the scheduled holiday program.

Child Care Subsidy

Accessing CCS

It is the responsibility of the parents/guardians to communicate with Centrelink about their child/ren attending a care service. A Complying Written Arrangement (CWA) is generated as part of the online enrolment process and this requires parents/guardians to approve the booking through their Centrelink online account (accessed through MyGov or the Centrelink app), prior to any CCS being payable to the service as a fee reduction for the family.

Reporting Absences (CCS)

Child Care Subsidy is payable for up to 42 absence days for a child in a financial year for sessions of care a child is enrolled in and did not attend and where there is still a liability to pay a fee for the session.

In shared care arrangements (where separated parents both claim Child Care Subsidy for the child's care), the allocation of 42 absence days relates to the child, not to each individual claimant.

Once 42 absence days have occurred in a financial year, *Child Care Subsidy* can only be paid for any additional absences where they are taken for a reason set out in Family Assistance Law. These reasons are:

- the child, the individual who cares for the child, the individual's partner or another person with whom the child lives is ill and the service has been given a medical certificate by a medical practitioner
- the child is attending preschool
- alternative arrangements have been made on a pupil-free day

- the child has not been immunised against an infectious disease, the absence occurs during an immunisation grace period and a medical practitioner has certified that exposure to the infectious disease would pose a health risk to the child
- the absence is because the child is spending time with a person other than the individual who is their usual carer as required by a court order or a parenting plan, and the service has a copy of the relevant court order or parenting plan for the child
- the service is closed as a direct result of a period of local emergency
- the child cannot attend because of a local emergency (for example, because they are unable to travel to the service), during the period of the emergency or up to 28 days afterwards
- the individual who cares for the child has decided the child should not attend the service for up to seven days immediately following the end of a period of local emergency

Child Care Subsidy and *Additional Child Care Subsidy* is payable for all additional absences and there is no limit on the number of additional absence days a recipient may claim, providing the absence days are taken for specified reasons and supporting documentation, where required, is provided.

The Nominated Supervisor (or relevant delegate) will liaise with families to ensure relevant supporting documentation is received from families where this is required. Families failing to produce a valid reason and/or supporting documentation may not receive a subsidy payment and will, therefore, be liable for the full fees for the absent session.

Closure Due to Public Health or Unforeseen Circumstances

In the event that the Service is directed to provide limited care or close due to public health directions, the cancellation of permanent bookings will be at the sole and absolute discretion of the Approved Provider in accordance with procedures as set out in policy [7.10 Fees, Statements and Parent Gap Fee Payments](#).

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations:**
 - R.99 Children leaving the education and care service premises
 - R.101 Conduct of risk assessment for excursion
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard, Quality Areas:**
 - QA2 – Children's health and safety
 - QA3 – Physical environment
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [A New Tax System \(Family Assistance Administration\) Act 1999](#)
- Department of Education - [Child Care Provider Handbook](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[6.1 Access for Families](#)

[6.2 Enrolment and Orientation](#)

[6.4 Acceptance and Refusal of Authorisations](#)

[6.5 Interactions and Communication with Families](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.5 Governance and Management](#)

7.6 Privacy and Confidentiality of Records

7.11 Child Care Subsidy (CCS) and Additional Child Care Subsidy (ACCS) Management and Compliance

Policy 6.3 Bookings and Cancellations		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V2-03.2025 – Added additional procedures relevant to authority to book care, annual booking procedure, cancellations and advising absences and cancellation of care.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional procedures relevant to closures due to public health or unforeseen circumstances, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

6.4 Acceptance and Refusal of Authorisations

Policy Statement

The purpose of this policy is to set out the comprehensive process for collecting and managing authorisation, especially those that are sensitive to the needs of children and their families. Written authorisations from parents/guardians or authorised nominees help to ensure that the health, safety, wellbeing and best interests of all children are met. Through the authorisation process, parents/guardians are informed of risks associated with a matter and can make an informed choice whether or not to proceed. The service is committed to ensuring this process is respectful of each family's cultural background and beliefs, in line with the Queensland Child Safe Standards.

Required Authorisations

The Service will only accept an enrolment for a child where the parent/guardian has authorised the service to seek medical treatment for children and transportation by an ambulance service (Regulation 161). A parent/guardian failing to submit this authorisation will not have their enrolment progress. Likewise, an enrolment will be cancelled, where the authorisation is retracted as this is a non-negotiable requirement to ensure the child's safety in a medical emergency.

There is also a responsibility to obtain authorisations from parents/guardians, or potentially, an authorised nominee for:

- administering medication to children (Regulation 92 and 96),
- children leaving the premises in the care of the parent/guardian or the authorised nominee (Regulation 99),
- excursions (Regulation 102),
- transport provided or arranged by the service (Regulation 102D),
- sharing information or records with others (Regulation 181).

Where an authorisation is required for a specific action/procedure to occur, the authorisation must be provided in writing before the service can carry out the task, except for emergency medication administration, where verbal consent can be provided (Regulation 93(5)).

Additional Authorisations

From time-to-time, the Service may also seek to have informed consent and authorisation for aspects that intersect programming or other elements of education and care (such as displaying photos). The Service will make every effort to include families in the decision-making process and provide relevant information to assist in making an informed decision, respecting the child's right to privacy and the family's cultural perspectives on image use.

Where there is a service or regulatory requirement for an authorisation, the Service will require it in writing. All written authorisations (and/or documented refusals) will be handled in accordance with policy [7.6 Privacy and Confidentiality of Records](#) and retained with enrolment records.

Refusal of Authorisations

While parents/guardians can decide to not provide an authorisation, depending on the nature of the refusal, it may implicate the ability of the Service to educate and care for a child. Where a parent/guardian refuses authorisation, the Service reserves a right to also refuse care, as our primary duty is to ensure the child's safety and wellbeing.

The Service will also maintain their duty for the safety and wellbeing of children. Notwithstanding a parent/guardian's authorisation, if the Service believes the action would jeopardise a child's safety and protection, where it is lawful, they may reserve the ability to refuse the parent/guardian's authorisation (e.g. leaving the service in a dangerous manner). This is a fundamental aspect of the service's child protection obligations.

Roles and Responsibilities

Approved Provider	• Ensure parents/guardians have the opportunity to authorise or decline relevant elements of the service's programs • Ensure these requests are followed by the service • Develop and implement policies and procedures to support acceptance and refusal of authorisations. • Ensure the child enrolment form has the capacity to gather information about the authorised nominee who is authorised to consent to medical treatment, administering medication and can authorise a child being taken outside the service for excursions and/or regular outings. • Ensure the required authorisations are kept in the enrolment record for each child enrolled to allow the Approved Provider, Nominated Supervisor and educators to: • Seek medical treatment for children by a medical practitioner, hospital or ambulance service, and/or • Transport children by ambulance. • Ensure details of any court orders, parenting orders or parenting plans are provided. • Establish systems to ensure children's enrolment information is kept updated and current and that all staff understand their duty of care related to these documents.
Nominated Supervisor	• Ensure that all required authorisations are included in • children's enrolment record • medication records • excursion and regular outing permission forms • Lead the service authorisation and record keeping practices to ensure information is received and collate information in a manner that ensures authorisations are followed as parents/guardians have requested. • Communicate with parents/guardians and support flexibility of amending authorisations. • Ensure all required authorisations have been provided to the service and maintain the storage of relevant written authorisations. • Ensure the child's enrolment form is completed and contains all the prescribed information required under R.161. • Where there are court orders, parenting orders or parenting plans in place, all relevant documentation has been provided to the service. • Ensuring that the health, safety, wellbeing and cultural needs of the child is prioritised when deciding to accept or refuse an authorisation • Documenting any decision to refuse an authorisation, to be kept on the child's file • Informing the Approved Provider of any decision not to accept an authorisation. Should parents/guardians be unsatisfied, they can request review by the Approved Provider.
Families	• Complete all required authorisations on the enrolment form, including consent for emergency medical treatment and transport by ambulance. Without these, the service cannot provide care. • Communicate to the Nominated Supervisor any individual requests regarding authorisations which may differ from those noted on the child's enrolment record. • Keep their child's enrolment records up-to-date. This includes contact details, authorised nominee lists, and any court orders or parenting plans. Timely updates are critical for ensuring the child's safety in emergencies. • Update the Service in relation to any medical conditions, medical plans or ongoing medication requirements including the names of medications, dosage, signs, and symptoms and contact information for any relevant health professionals.

	• Ensure that where children require medication to be administered by the Service, this is authorised in writing, signed and dated and the medication is provided. • Ensure permission forms are signed and returned to acknowledge approval for the child/ren to attend an excursion as planned. • Provide approval for images, videos and/ recordings of the child/ren for the purposes of programming documentation to meet the Service's regulatory responsibilities. • Read and understand all service policies and procedures, especially those related to authorisations. • Engage in open and respectful communication with the service. This includes discussing any cultural or personal needs that may affect authorisations and understanding the service's duty of care.

Key Tasks and Responsibilities

Collecting Authorisation	The Nominated Supervisor is responsible for ensuring all required authorisations have been provided to the service. This will be done in a culturally sensitive manner, ensuring families understand the purpose of each request.
Refusing Authorisations	The Nominated Supervisor is tasked with being the primary decision-maker for refusing relevant authorisations on reasonable grounds. Should parents/guardians be unsatisfied, they can request review by the Approved Provider.
Maintaining Records	The Nominated Supervisor will maintain the storage of relevant written authorisations.

Procedures

Authorisations for Enrolment

A family's enrolment is subject to the authorisation for the consent of medical treatment, including transportation via ambulance. No enrolment will be accepted without the signed agreement of a parent/guardian in the enrolment form.

Additionally, upon enrolment, the parent/guardian will have the opportunity to provide authorisation for:

- other persons to collect their child(ren) (authorised nominee),
- emergency contact persons, and/or
- regular outings (if applicable).

Upon completing the enrolment form, the parent/guardian will be prompted to agree to the Service terms and conditions of enrolment, which may include-

- Sharing relevant information with school representatives around the care of their child, including health and wellbeing information, significant behaviour incidents, and absences due to sickness or illness. This is essential for a collaborative approach to a child's safety and wellbeing, particularly for Aboriginal and Torres Strait Islander children where cultural identity and family connections are crucial.
- Providing informed consent for photos of their child taken to document learning outcomes and significant events as part of the program being displayed within the service to showcase children's learning.
- OSHC educators to liaise with other health/medical professionals in relation to the care of their child,
OSHC educators to assist their child to apply a SPF 50+ sunscreen prior to outdoor activities.

Written notification is required if parents/guardians do NOT give authorisation for their child to be included in photography opportunities which may include:

- videos of children taken for the children to be able to watch themselves at play. These videos may be made available to all families to view at various times.

- when children are invited to take photographs or videos either with digital cameras or tablets with story-making apps to support language and literacy development. Hard copies of these may be printed and made into a book produced by children. These will remain within the Service but may be viewed by families and visitors

Authorisations - Acceptance

The Nominated Supervisor will ensure parents/guardians are aware of the requirements for authorisations through the enrolment and orientation process and the policies and procedures.

Parents/guardians will ensure there is up-to-date information on their child's enrolment records to ensure that in emergency situations, the parent/guardian or authorised nominee can be contacted.

Parents/guardians provide authorisations as noted below and must always ensure they or the person collecting their child is fit to take responsibility for the child.

Type of Authorisation	How these authorisations are managed
Regulation 92	Details to be recorded on a medication record include the authorisation to administer medication (including self-administering medication by a child over school age if appropriate) signed by a parent/guardian or a person named in the child's enrolment record and authorising consent to an educator administering medication. Medication may be administered to a child without an authorisation in case of an anaphylaxis or asthma emergency. Guidance on this authorisation is covered in the <i>Medical Conditions in Children</i> and <i>Administration of Medication</i> policies and procedures.
Regulation 96	An Approved Provider may permit a child over preschool age to self-administer medication if: • an authorisation for the child to self-administer medication is recorded in the medication record for the child (as per R.92), and • the medical conditions policy of the service sets out practices in relation to self-administering of medication by children over preschool age. Guidance on this authorisation is covered in the <i>Administration of Medication</i> policy and procedure.
Regulation 99	The Approved Provider and Nominated Supervisor must make sure that a child being educated and cared for by the service does not leave the premises except where the child: • is given into the care of a parent/guardian, an authorised nominee named in the child's enrolment record, or a person authorised by a parent/guardian or authorised nominee; or • leaves in accordance with the written authorisation of the child's parent or authorised nominee; or • is taken on an excursion and written authorisation is given; or • is given into the care of a person or taken outside the premises because the child requires medical, hospital or ambulance care or treatment, or another emergency. Guidance on this authorisation is covered in the <i>Enrolment and Orientation</i> and <i>Excursion and Transport</i> policies and procedures.
Regulation 102	Authorisation must be given by a parent/guardian or other person named in the child's enrolment record as having authority to authorise the taking of the child outside the premises by an educator.

	The authorisation record must state the information as listed in regulation 102(4). If the excursion is a regular outing, the authorisation is only required to be obtained once in a 12 month period. Guidance on this authorisation is covered in the <i>Excursion and Transport</i> policy and procedures.
Regulation 161	An authorisation signed by a parent/guardian, or a person named in the enrolment record as authorised to consent to the medical treatment of the child, for the Approved Provider, Nominated Supervisor or an educator to seek medical treatment for the child from a registered medical practitioner, hospital or ambulance service and transportation of the child by an ambulance service. If relevant, an authorisation is given under R.102 for the service to take the child on regular outings. Guidance on this authorisation is covered in <i>Medical Conditions in Children, Administration of Medication, Enrolment and Orientation</i> and <i>Incident, Injury, Trauma and Illness</i> policies and procedures.

In caring for children and participating in the program, there may be circumstances where additional authorisation are required. This includes—

Verbal Authorisations

Will be accepted by the Service however the Nominated Supervisor/Responsible person will-

1. Confirm the identity of the person providing the authorisation,
2. Ensure the person is an authorised person on the child's enrolment form,
3. Document the nature of the authorisation being sought/given; and
4. Record the name of the person, how the identity was confirmed and the time and date of the verbal authorisation. This protocol is a vital child safety measure to prevent children from being released to an unauthorised person.

Circumstances Where Authorisations are not Required

Where medication is required to be administered in an emergency and prior written consent has not been provided, verbal authorisation can be provided by-

- The parent/guardian.
- A person named in the enrolment to provide authorisation for medication administration.
- Or where the parent/guardian or other person named in the enrolment records cannot be reasonably contacted in the circumstances, a registered medical practitioner or emergency service.

Details of verbal authorisation will be documented in the Incident, Injury, Trauma and Illness Record.

The Service will waive compliance with this policy where a child requires emergency medical treatment for conditions such as anaphylaxis or asthma. The service can administer medication without authorisation in these cases, provided they contact the parent/guardian as soon as practicable after the medication has been administered.

Refusing Authorisations

Parent/guardian Refusal of Authorisations

A parent/guardian may refuse to provide authorisation for the child; however, this may impact the Service's ability to provide education and care for the child, this includes-

Refusal or non-authorisation for—	Outcome
Authorisation for medical treatment, including transportation via ambulance.	Education and care cannot be provided to the child by the service. This is because the service cannot guarantee the

	child's safety in a medical emergency, which is a key requirement of our duty of care.
Participation in an excursion.	Where the excursion is the only activity for a vacation care day, care cannot be offered for that day.
Sharing of information with school representatives.	Possible withdrawal of enrolment, as procedures for safeguarding children based on coordinated communication with the school are a fundamental aspect of our child protection framework and cannot be compromised.

Service Refusal of Authorisations

The Service retains the ability to refuse a parent/guardian's authorisation where the authorisation would conflict with another duty, principally, the safety and wellbeing of children. This may include but is not limited to the circumstances where a child is allowed to leave the service unaccompanied.

Where the Approved Provider, Nominated Supervisor, or Responsible Person believe the authorisation from the parent/guardian would jeopardise the safety and wellbeing of a child, they will be informed of the Service's decision to refuse the authorisation.

The following table provides some guidance on when this may occur:

Type of Authorisation	Considerations for a Refusal
Administration of medication (regulation 92)	If someone not listed as an authorised nominee asks the service to administer medication to the child, OR If the service is requested to administer medication that is not in accordance with the requirements of regulation 95 such as, being administered from its original packaging or the name on the medication is not that of the child, or the dosage noted on authorisation is not in accordance with the recommended dosage on packaging, or the medication has expired.
Self-administration of medication (regulation 96)	The service will consider if the child is capable of self-administering the medication, or if the service will allow all school age children to self-administer. The parent/guardian has not provided all the information required on the administering medication form. The medication does not have the child's name on the label, has expired; or the child does not appear confident and competent in undertaking the task of self-administering medication.
Children leaving the education and care service premises (regulation 99)	If the parent/guardian or authorised nominee or person as listed as per R.99 does not appear to be fit to take care of the child e.g., appears to be under the influence of drugs or alcohol. The sibling or older child authorised to take another child out of the service does not appear to be capable. The child has been given authorisation to leave the service alone, however they do not appear to be capable or the environment they would be alone in is unsafe. In the event that a person not known to the service is asked to collect the child by a parent/guardian and the parent/guardian has given permission, the Nominated Supervisor will ask the person for photo identification to prove their identity. Children will not be released to a person unless the parent/guardian has informed the service that this will be the case, or if the person arriving to collect the child does not have photo identification to verify their identity.
Authorisation for excursions (regulation 102)	If an authorisation received by the service for an excursion does not meet the requirements of R.102, such as it appears to not have been signed by a person authorised to sign.

If an authorisation is refused by the Service, the Nominated Supervisor/Responsible person will document the following information:

- Details of the authorisation being refused,
- Rationale for why the authorisation was refused,
- Actions taken by the Service (i.e., if the Service refused an authorised nominee named in the child's enrolment record to collect the child from the service as they were under the influence of alcohol, what action was taken, to ensure that the child was collected safely).

Documentation of authorisation refusal must be kept on the child's enrolment record. The Nominated Supervisor will consider the next steps for example, if changes in authorisation is required.

Updating and Amending Authorisations

Parents/guardians are responsible for and have the right at any time to change authorisations given to the Service in relation to their child and their child's participation in the program. This may be done through completion of an updated enrolment form or other written authorisation. A child's enrolment and participation in the Service will remain subject to relevant authorisations being maintained. It is the family's responsibility to ensure these are kept current for the child's ongoing safety and wellbeing.

Record Keeping

All authorisations will be retained with the child's enrolment records and will be handled as per policy [7.6 Privacy and Confidentiality of Records](#).

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.175 Offence relating to requirement to keep enrolment and other documents
- **Education and Care Services National Regulations:**
 - R.93 Administration of medication
 - R.94 Exception to authorisation requirement—anaphylaxis or asthma
 - R.99 Children leaving the education and care service premises
 - R.102 Authorisation for excursions
 - R.102D Authorisation for service to transport children
 - R.158 Children's attendance record to be kept by approved provider
 - R.160 Child enrolment records to be kept by approved provider and family day care educator
 - R.161 Authorisations to be kept in enrolment record
 - R.162 Health information to be kept in enrolment record
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Privacy Act 1988 \(Cth\)](#) / [Information Privacy Act 2009 \(Qld\)](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[1.4 Excursions, Incursions and Regular Outings](#)

[1.5 Sleep, Rest and Relaxation](#)

[1.6 Food and Nutrition](#)

[2.3 Safe Arrivals and Departures of Children](#)

[2.4 Incident, Injury, Trauma and Illness](#)

[2.6 Water Safety](#)

[2.7 Infectious Diseases](#)

[2.9 Medical Conditions in Children](#)

[2.10 Administration of Medication](#)

[2.11 Sun Safety](#)

[6.9 Childhood Immunisation](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.5 Governance and Management](#)

[7.6 Privacy and Confidentiality of Records](#)

Policy 6.4 Acceptance and Refusal of Authorisations		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Address regulatory changes		
V1-06.2024 – No updates		
V2-03.2025 – Added additional information to all roles and responsibilities. Added additional procedures relevant to acceptance of authorisations, circumstances where authorisations not required, service refusal of authorisations		
V3-10.2025 – Enhanced policy statement, added family and enhanced roles and responsibilities, enhanced key tasks and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – No updates		

6.5 Interactions and Communication with Families

Policy Statement

The Service acknowledges the unique insights that families provide with a wealth of valuable information and understanding about their child, and we foster strong, respectful partnerships between our staff and educators and families. The Service recognises the importance of effective communication with families and strives to encourage their participation and involvement to enhance the service provided. This partnership is built on a foundation of mutual trust and respect, essential for creating a child-safe and culturally safe environment.

The Service believes in creating an environment that is welcoming and inclusive and supports a sense of belonging for children, families, and educators. Parents/guardians are welcome to attend the service and through our open door strategy, the Approved Provider encourages families to voice their views in a way that will assist the Service to be inclusive and responsive to individual's needs and wishes.

The Service strives to provide a safe and healthy workplace for employees, and a caring and supportive environment for children, parents and guardians. The Service believes that effective communication and mutual respect is the key to developing and maintaining positive interactions and relationships with others, including our parents and guardians.

Roles and Responsibilities

Approved Provider	• Establishes a culture of openness, transparency and respectfulness. • Inform families about special days and events they may want to take part in • Take all reasonable steps to ensure any parent/guardian, family member or visitor that may pose a risk to the safety and wellbeing of the children and staff of the Service are not permitted entry. This includes a clear process for managing individuals who may have a court order prohibiting contact with a child.
Nominated Supervisor	• Information communicated with families is reliable and accurate • Be approachable and responsive to families, including making time for discussion. • Ensure relevant communication methods are established with families to support meaningful information sharing, including adapting communication to be culturally appropriate and accessible to all families. • Positive community relations are promoted and methods of communication with families are translated into home languages as required. • Develop positive parent/guardian partnerships to enrich children's development and wellbeing. • Families are invited to participate in routines and events at the Service
All Staff	• Be inviting, courteous and respectful in all interactions with families. • Develop collaborative partnerships with families that involve respectful communication about all aspects of a child's learning • Refer families to the Nominated Supervisor for support where needed. • Be aware of and responsive to any family communication that may signal a child safety concern.
Families	• Maintain respectful interactions with all service educators and other staff • Discuss any changes that have occurred in the child's life, for example, changes in family circumstances, moving to a new house, death of a family member or friend etc., in order for educators to best support all children through difficult times • Notify the Service of any change to current court orders or parenting plans/orders, as this is crucial for the safety and protection of all children.

Procedures

Parents/guardians will be able to access their child anytime they are in attendance at the Service. Parents/guardians will have access to meet with the Nominated Supervisor throughout daily sessions and/or by pre-arranged appointment to discuss any issues or concerns with respect to their child and/or the service.

****Please note: a parent does not include a parent who is prohibited by a court order from having contact with the child. In such cases, the service must be provided with the court order and will follow a strict protocol to prevent contact, in accordance with our child protection obligations.***

On enrolment, a *Family Handbook* will be provided as part of the service enrolment package. The information contained in the handbook is to guide parents/guardians on the expectations for themselves and their child(ren) while they access the service. It will also summarise important aspects of the operations and highlight key policies, including our commitment to child safety and wellbeing.

The Service shall develop and implement strategies and processes that identify:

- Parent/guardian skills and interests suitable to the program,
- How such parent/guardian involvement will support the overall objectives of the Service and in particular program delivery; and
- When such parent/guardian skills and interests may be utilised as part of the program throughout the year in a way that promotes a welcoming and culturally inclusive environment.

Parents/guardians will be encouraged to participate in the Service through attendance at management meetings and/or service events.

Communication with Families

The Service encourages family participation and open communication within our OSHC Service. Effective communication is the key to developing and maintaining positive interactions and relationships with others therefore Educators will use positive communication with parents and guardians in order to create a responsive and inclusive environment for all.

The Service recognises that parents/guardians are all unique and a preferred method of communication for one parent/guardian, may not be the same for another parent/guardian. Educators will never discuss another child or parent/guardian information with another family/caregiver or visitor.

Parents/guardians are provided with up to date service information and notices through:

- Emails,
- Office signage,
- Meetings between Nominated Supervisor/educators and parents/guardians,
- Posts and notifications sent through the Service social networking site.
- Regular newsletters; and/or
- Sign in and notice board area; and/or
- Notices written by the Nominated Supervisor and approved by the Approved Provider, being given to parents/guardians when there are matters of changed policy and it is important for the changes to be communicated before the next newsletter or monthly meeting.

The Nominated Supervisor may refer families to information relating to community support and resource agencies that are accessible and available at the sign in/notice board area, including culturally appropriate services for Aboriginal and Torres Strait Islander families and other families from diverse cultural backgrounds.

The Nominated Supervisor will treat all enquiries and concerns, and the persons making them, seriously and with respect and will endeavour wherever possible to answer questions and provide required information. An interpreter service may be made available (where required) to ensure communication with parents and families is not hindered due to language barriers.

Homework

Families may request their child complete homework while at the Service by speaking with the Nominated Supervisor, who will maintain a list of names of children who are to do homework each day.

Homework completion remains the parents/guardians responsibility, educators will not be responsible for monitoring and signing off on homework.

Children doing homework will be supervised in a quiet environment, away from the other children if possible.

Educators will assist children with projects and homework to the extent possible, taking into consideration supervision and duty of care issues in relation to the other children in care.

Parent/Guardian Conduct When at OSHC

Upon entering the Service, all parents/guardians and visitors will be expected to communicate appropriately with all educators, other children and their families, whilst dropping off or collecting their children, as permitted to and from the Service.

Within this policy and other relevant policies, inappropriate communication, aggressive behaviour or workplace violence could include, but is not limited to:

- verbal abuse and threats,
- intimidation and insults,
- angry and hostile behaviour,
- shouting and swearing,
- stamping feet,
- physical violence,
- threatening behaviours.

Appropriate communication shall include, but not be limited to:

- Appropriate Language,
- Calm tone,
- Considerate body language, and
- reasonable manner of communication.

Parents/guardians have rights and responsibilities associated with their involvement in the Service. They are as follows:

- Ensure their child is aware of their attendance schedule at after school care & the need to arrive promptly at the service
- Encourage good behaviour habits in their children,
- Encourage their children to accept the service's rules and guidelines,
- Provide support and feedback to the service regarding rules and guidelines for of behaviour,
- Consult with service educators at a mutually convenient time about any concerns and treat service educators with respect and courtesy; and
- Conduct themselves in accordance with this policy and in such a way that does not make educators feel threatened. This includes speaking with a calm and respectful tone of voice.

Parents/guardians have a right to:

- Be respected and recognised as the major influence upon their child's development,
- Be able to express themselves in a reasonable manner on matters of service policy,
- Meet with service educators at a mutually convenient time; and
- Be offered the same courtesy and respect within the service as the service educators.

Parents/guardians shall not be permitted to approach, touch or discipline verbally any children of other families. Should a parent/guardian have an issue or concern regarding the conduct of another child, family or employee, they must follow appropriate grievance procedures as outlined in policy [6.7 Feedback and Complaints Handling](#).

Parents/guardians displaying behaviour that breaches this policy, and procedure will be asked to leave the Service premises and the incident will be referred to the Nominated Supervisor and Approved Provider.

Parents/guardians who display violent and threatening behaviour at any time or who consistently breach the conduct expected of them whilst engaging with the Service will be referred to the Approved Provider for further action which may include:

- Written caution regarding reported behaviour and reminder of appropriate conduct; or
- Exclusion from the Service premise for a prescribed period of time; or
- Suspension of their family's enrolment with the Service

Educators have the right to ask a person to leave the premises if they feel intimidated in any way. The Police may be notified if any parent/guardian conduct within The Service is threatening or violent towards staff, children or others present at the service.

Dealing with difficult, challenging and aggressive behaviours can have a huge impact on staff's wellbeing. Following any such incident involving a parent/guardian, family member or visitor, the Approved Provider will ensure staff involved are:

- provided with a 'debriefing' time. This may be talking to a manager or colleague, or simply moving off the floor for a short time,
- document the incident and provide management with a copy,
- follow up on anything agreed to with the parent/guardian, family member or visitor or monitor that another staff member/ management person follows up in a timely manner, respecting the confidentiality and/or privacy rights of the parent/guardian, family member or visitor.

Educator Interactions with Families – Professional Boundaries

The Service acknowledges that throughout the course of providing education and care to children, educators develop trusting and supportive relationships with families. These relationships have been known to extend beyond the professional boundaries of the Service.

Educators who are personally friendly or are in existing relationships with family members of children who attend the Service (such as brother, sister, aunt, uncle, etc.) shall declare such relationships to the Nominated Supervisor so that professional boundaries and expectations can be clarified.

On occasion, educators may be requested by families to attend personal events (such as birthday parties) or to provide services for their children such as babysitting. Families engaging an educator or staff member in private babysitting is not eligible to claim additional Child Care Subsidy (CCS).

The Service duty of care to protect children does not extend to private arrangements between educators and families outside of the service. However, educators do have a duty to report any health, safety, and/or wellbeing concerns in and outside of work, including child protection concerns.

The following protocols shall apply whenever such private arrangements between families and educators are made:

- Any employee/employer arrangements made between an educator and the family shall be completely independent of the relationship between the Service and the employee.
- Any arrangements made between an educator and the family must be declared with the Nominated Supervisor (as a potential conflict of interest) and not interfere with the educator's usual work engagements or availability for the Service
- The conduct of the educator is not guaranteed by the Service for any work conducted outside of The Service. This includes references to suitability checks and employment history.
- The Service will not be made accountable for any health and safety issues that may arise within the private arrangement being made,
- If an educator is to collect a child from the Service, they must be authorised and/or listed as having authority to do so on the child's enrolment form (a record of written authorisation is to be kept in the child's enrolment record)
- Educators engaged by families to provide private child care services outside the Service operating hours will be encouraged to maintain ethical practices and standards including:
 - Maintaining confidentiality of personal information, respecting the families right to privacy,

- Use of personal mobile phones and devices, and photography to ensure privacy and confidently is maintained,
- Demonstrating behaviour that enriches the provision of care and advances the OSHC profession.
- Families will be provided with information about professional boundaries and child safety, specifically outlining the risks associated with private arrangements, to ensure they are able to make an informed decision.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations**
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA6 – Collaborative partnerships with families and communities

Additional Regulatory Context and Guidance

- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [1.1 Educational Program Development and Implementation](#)
- [1.3 Sharing the Program and Children's Progress with Families](#)
- [2.3 Safe Arrivals and Departures of Children](#)
- [2.9 Medical Conditions in Children](#)
- [6.2 Enrolment and Orientation](#)
- [6.4 Acceptance and Refusal of Authorisations](#)
- [6.7 Feedback and Complaints Handling](#)

Policy 6.5 Interactions and Communication with Families		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V2-06.2024 – Additional procedures relevant to communication with families including homework, parent conduct when at OSHC, Educator interactions with families - professional boundaries		
V3-03.2025 – Added additional information to roles and responsibilities for AP, Staff and added families. Added additional procedures relevant to parent/guardian conduct and professional boundaries.		
V4-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards.		
V4-04.2026 – No updates		

6.6 Community Communication and Participation

Policy Statement

The Service acknowledges the importance of its local community and seeks to act both in the interests of its community and in enhancing the experience of children as members of the community.

The Service is committed to practice that reflects Quality Area Six of the National Quality Standards, in particular, building and engaging in strong relationships within the community. This includes a specific commitment to cultural safety and fostering a sense of belonging for all children, particularly Aboriginal and Torres Strait Islander children.

Roles and Responsibilities

Approved Provider	• Ensure the service's practices reflect the National Quality Framework, including the Service Philosophy reflecting the views and wishes of the community. This includes ensuring the service is a child-safe and culturally safe environment.
Nominated Supervisor	• Establish local connection with individuals and groups and seek out engagement opportunities with a focus on partnerships that enhance child safety and wellbeing and promote cultural diversity and inclusion. • Collect and maintain relevant community resources to assist in facilitating and extending connection between families and their community. • Respond to community members with professionalism and in a manner that upholds the service's reputation and philosophy.
Educational Leader	• Develop a program that is shaped by meaningful engagement with families and the community that is culturally responsive and promotes the safety, wellbeing, and empowerment of all children.
All Staff	• Display conduct that is inclusive, respectful and inviting to the community. • Respond to opportunities for community connection/engagement with professionalism. • All interactions with community members must be conducted in a way that models appropriate behaviour for children and prioritises their safety and wellbeing.

Procedures

Engagement Through the Program

The Service will seek out opportunities for the service to connect and maintain relevant relationship with their local community. The Service's planning will reflect opportunities to explore and experience the community surrounding OSHC, and where possible, invite individuals into the service to establish partnerships for children.

Families of the Service will be encouraged to suggest suitable and appropriate community venues that may be considered for excursions, incursions etc. with a focus on ensuring these experiences are safe, inclusive, and culturally enriching.

The Educational Leader will be supported to ensure the service's practices are shaped by meaningful engagement with families and the community. The Educational Leader will be encouraged to facilitate educators to actively engage in dialogue, open communication and partnerships with families.

Service Delivery and Engagement

The Service is committed to upholding a philosophy and program that reflects the needs and worldview of the families that attend and participate. The Service will review the Service Philosophy as needed.

Opportunities for feedback and information gathering to reflect on the Service's connection to the community will be an embedded practice in the quality improvement processes of the service.

Community Services and Resources

The Service will retain a collection of helpful resources to support their community of families. The Nominated Supervisor is responsible for collecting and maintaining this catalogue of information and contacts, ensuring it includes resources for child safety, family support, and culturally specific services.

Responding to the Community

The Nominated Supervisor will treat all enquiries and concerns seriously. All interactions with community members are to be respectful and courteous. Questions, answers and required information should be responded to promptly and with integrity.

Any concerns about the Service which are identified will be managed through policy [6.7 Feedback and Complaints Handling](#).

Managing Conflict of Interest

The Service is committed to ensuring that business and operational decisions are not negatively impacted by either a perceived or actual conflicts of interest. The service expects all perceived or actual conflicts of interests will be declared and managed. The service recognises conflicts of interest may be pecuniary (relate to money) - actual or potential financial gain, or non-pecuniary without any financial element but may offer advantage for social benefit. This commitment to transparency and accountability is a fundamental component of the Queensland Child Safe Standards.

The management of conflicts of interest will be supported by the principles of probity transparency, and accountability. Procedures for managing conflicts of interest will be followed by all relevant decision-making stakeholder (the service's governance, leaders, employees and volunteers).

Declaring Conflict of Interest

It is the responsibility of any persons (Approved Provider, employee or volunteer) to make a relevant declaration of any actual or perceived conflict of interest as soon as this becomes known to the person.

- All employees and volunteers are expected to declare conflicts of interest to the Nominated Supervisor.
- The Nominated Supervisor will report the declarations and management plans to the Approved Provider.
- The Nominated Supervisor and executive members of the Approved Provider will declare any of their conflicts relevant to the operation and compliance with CCS.

Responding to a Conflict of Interest

Ideally, all conflicts of interest will be avoided.

Where this is not possible, conflicts of interest can be managed through one of the following strategies:

- **Restrict** – limit or remove the participation of decision making for a person with the conflict of interest.
- **Recruit** – source an independent person to oversee aspects of the relevant processes.
- **Remove** – absolve the responsibility of person/s with conflict of interest.
- **Relinquish** – surrender the private interest that gives rise to the conflict of interest.

A record of the declared conflict of interest and agreed management plans will be maintained. The Approved Provider must be satisfied with the efficacy of the proposed plans with expressed approval before progressing with any actions related to a conflict of interest. Where an Approved Provider member is a party of a conflict of interest they will remove themselves from the approval of the conflict of interest management plans.

Non-Compliance

Failure to either declare or act consistently with agreed conflict of interest plans will be viewed seriously. Employees found to be engaged in conduct that has advantaged themselves or others through unethical or dishonest actions result in disciplinary action up to and including termination.

Reconciliation Action Plan

Management and educators will demonstrate value and respect for Australia's Aboriginal and Torres Strait Islander cultures and collaborate on the development of a reconciliation plan which includes:

- Identifying the local elders within the community,
- Building a relationship with local elders and exploring ways in which these elders can share in the Service's plan for reconciliation,
- Including an 'Acknowledgement of Country' in appropriate ceremonies and events; and
- Other aspects as seen relevant to promoting respectful partnerships between the Service and the Aboriginal and Torres Strait Islander community.

This is a direct and actionable commitment to the Queensland Universal Principle for Child Safe Standards, which focuses on creating culturally safe environments for Aboriginal and Torres Strait Islander children.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations**
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA6 – Collaborative partnerships with families and communities

Additional Regulatory Context and Guidance

- [Privacy Act 1988 \(Cth\)](#)
- [My Time Our Place - Framework for School Age Care in Australia V2.0, 2022](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[1.1 Educational Program Development and Implementation](#)

[1.4 Excursions, Incursions and Regular Outings](#)

Policy 6.6 Community Communication and Participation		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V2-06.2024 – Additional information relevant to Reconciliation Action Plan and Managing Conflict of Interest		
V2-03.2025 – No updates		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards.		
V3-04.2026 – No updates		

6.7 Feedback and Complaints Handling

Policy Statement

The Service is committed to providing a high standard of education and care, and we recognise that feedback and complaints are vital to achieving this. These mechanisms help us improve our practices, ensure inclusive access to our services, and uphold the rights and safety of every child and family.

The Service acknowledges the rights of children, parents/guardians, and all community members to raise a complaint about any issue impacting our service delivery or the quality of care provided. Our complaint procedures are accessible to everyone, and we are dedicated to ensuring a culture where all individuals feel safe and supported in raising concerns, with a particular focus on empowering children and families from diverse cultural backgrounds to speak up without fear of retribution.

Concerns can range in severity/seriousness. The Service defines **feedback** as positive communication or suggestions for improvement, while a **complaint** is a more serious view that something is unsatisfactory or unacceptable. The Service is committed to handling all complaints fairly and consistently with the principles of natural justice. No individual will face retribution or victimisation for raising a concern.

The Approved Provider is committed to leading a culture that is open to addressing concerns in a fair and reasonable manner and recognises their duty to comply with the Human Rights Act (Qld) 2019 and will follow the Education Department's policy for complaints regarding potential human rights violations.

Roles and Responsibilities

Approved Provider	• Ensure all obligations under the Education and Care Services National Law and Regulations are met, including notifying of serious complaints where required • Ensure information about how to provide feedback or make a complaint is provided through enrolment information and staff induction. • Support the Nominated Supervisor in handling any complaints, providing guidance and advice as needed. • Periodically review the register of complaints to identify systemic issues not being addressed, especially those related to child safety and wellbeing, and cultural safety. • Treat all grievances and complaints seriously and as a priority, ensuring confidentiality is maintained. • Manage all complaints fairly and without bias. • Provide opportunity for complaints to be raised directly with the Approved Provider. • Discuss any issues with the complainant within 24 hours of receiving the verbal or written complaint
Nominated Supervisor	• Lead a culture of fairness and ethical practice, ensuring individuals feel safe and empowered to raise a complaint without fear of retribution or victimisation. • Serve as the initial point-of-contact for most complaints. • Demonstrate a willingness to constructively address all feedback. • Notify the Regulatory Authority within 24 hours if a complaint alleges that a child's safety, health, or wellbeing has been compromised, including any incident or allegation where there is a reasonable belief that physical and/or sexual abuse of a child has occurred at the service.
All Staff	• Be open to accepting feedback and complaints from children, parents/guardians or other stakeholders, recognising that children may communicate concerns through play, drawing, or other non-verbal means. • Communicate all complaints through the designated reporting lines, with an immediate focus on any concern related to child safety.

	- Actively utilise complaint mechanisms and raise concerns particularly those related to child safety and wellbeing, as outlined in the procedure. - Acknowledge that feedback and complaints are opportunities to improve our practice.
Families	- Be informed of our duty of care to ensure a high level of equity and fairness in managing complaints. - Attempt to discuss any grievances or complaints with the Nominated Supervisor as a first step to resolving the issue - Communicate any concerns in writing to the Approved Provider or Nominated Supervisor - Maintain confidentiality at all times while understanding that the service has a duty to share information with relevant authorities if it is necessary to protect a child's safety.

Key Tasks and Responsibilities

Displaying complaints procedures	The Approved Provider is responsible for ensuring the Nominated Supervisor has relevant complaint information that is appropriately displayed.
Listening to concerns	All educators, especially the Nominated Supervisor and Responsible Person are responsible for exercising sound judgement and listening to concerns and feedback raised about the service. This information should be treated with respect and seriousness with a particular focus on child safety, wellbeing and cultural safety, to ensure all relevant procedures are followed.
Investigating allegations	The Nominated Supervisor is primarily responsible for the initial handling and reporting of complaints. The Approved Provider is responsible for ensuring management action is taken to fairly investigate and respond to all complaints raised.
Reporting allegations of non-compliance	The Nominated Supervisor will act on behalf of the Approved Provider to report relevant allegations of contravention of the National Law to the Regulatory Authority.

Procedures

Children

The service is committed to empowering children to have a voice. Children must be supported to express their concerns freely and safely. Educators must use sensitivity to fully understand children's perspectives and interests. Educators should demonstrate a proactive openness to hear and validate concerns and feedback raised by children.

All issues and concerns expressed by children will be met with support and guidance from Educators, who will work toward a timely and fair resolution. Educators will communicate all resolved and unresolved concerns to the Nominated Supervisor.

Where a resolution isn't immediately found, educators will model constructive behaviours by helping children define the problem, its cause, discuss options and arrive at an agreed course of action.

Serious concerns raised by children will be dealt with by the Nominated Supervisor and/or Approved Provider and in the appropriate forum. These serious concerns will also be communicated to parents/guardians at the earliest possible convenience, ensuring this is completed by the Nominated Supervisor or Responsible Person in Charge within 24 hours.

Serious concerns reaching the threshold for complaint, especially those related to a child's safety or wellbeing, may require incident reporting and notification to the Regulatory Authority (refer policy [2.4 Incident, Injury, Trauma and Illness](#) and [7.7 Managing Notifications](#)).

Parents/Guardians, Stakeholders and Employees

Awareness and Display of Complaint Procedures

Parents/guardians will be advised of the Feedback and Complaints Policy on enrolment. Details will be contained in enrolment information and a specific focus will be placed on how the service addresses issues of child safety and cultural safety. The name, position and contact information (including telephone number and email address) of the person to whom complaints may be directed will be displayed in a prominent location.

Employees will be advised of this policy and procedure during their induction and orientation and through information contained in the *Educator Handbook*.

Feedback

Parent/guardian feedback is welcomed and encouraged. Where concerns cannot be immediately addressed, the Nominated Supervisor will follow up with the parents/guardians to discuss steps toward a resolution. The person taking the feedback (Nominated Supervisor, educator etc.) should clarify if the person is expressing feedback or if they would like to raise a formal complaint for further management and/or resolution.

Employees will have opportunities to provide feedback through the Nominated Supervisor or at regular team meetings.

Complaints Process

Parents/guardians, stakeholders and employees may raise their complaint either verbally or in writing. If the grievance may take significant time to discuss, it will be expected that an appropriate meeting time will be arranged with the Nominated Supervisor for further discussion.

The Nominated Supervisor will be the preferred contact for complaints however, any staff member can receive a complaint and are encouraged to seek assistance from the Responsible Person if they feel they are unable to answer the parents/guardians concerns. The complainant will also have the ability to raise concerns with the Operations Manager and/or the executive members of the Approved Provider directly.

The Approved Provider should be the contact for complaints where:

- a. the complaint is about the conduct of the Nominated Supervisor,
- b. the complainant is not comfortable to take the complaint to the Nominated Supervisor,
- c. the complainant is not satisfied with the Nominated Supervisor's handling of the complaint,
- d. the complaint is regarding a matter of administration, management or governance.

Any complaints relating to misconduct of a staff member will be handled in accordance with relevant underperformance or misconduct procedures.

All complaints raised are to be documented on the 'Complaints Record' and recorded in the 'Complaints Register'. These records are stored in accordance with the service's information handling policy – securely, maintaining privacy and confidentiality through password protection.

The Nominated Supervisor will notify the Approved Provider of any complaints. The Approved Provider and Nominated Supervisor will discuss and plan who is most suitable to fulfil the role of complaint handler. They should be free from bias, impartial, have the capacity to manage the complexity and conflict.

Where a complaint relates to the possible violation or restriction on a **human right**, the Approved Provider will ensure the complainant's concerns are handled with respect and fairness and report the details to the School Principal for further guidance. The Approved Provider will ensure the Education Department's policy for complaints regarding potential human rights violation is followed.

Where the nature of the alleged complaint is suitable to be managed by the Approved Provider (internally), the complaint handler will contact the complainant to discuss (within 48 hours), seeking to identify:

- a. the nature and details of the complaint,
- b. the resolution sought.

Where a resolution can be easily addressed, the complaint handler will collaborate an action plan with the complainant and confirm the resolved status of the complaint. These items will be documented by the complaint handler and the complaint will be considered finalised.

Where resolution is not easily sought due to:

- a. strong dispute of the nature of the complaint or objection to the allegations,
- b. the conclusion will benefit from procedural fairness,
- c. previous resolutions have been unsuccessful, or
- d. there is a conflict of interest.

the Approved Provider will take steps to either mediate between the relevant parties (if appropriate) or investigate the matter to conclusion. If the complainant is an employee and they are not content with the outcome/resolution of the meeting they may contact their Union delegate for further advice.

The complaint handler will notify the complainant of the intention to either undertake mediation or investigation. The complaint handler will also outline anticipated timelines of either process with the complainant at this point. All anticipated timelines should be reasonable in the circumstance.

The mediation or investigation may be facilitated by the Approved Provider or outsourced to a third-party. Any mediator or investigator appointed should be free from bias, impartial and have the capacity to undertake the task.

Where an investigation is undertaken - the investigator will gather relevant information, including statements from the complainant and/or additional information from relevant parties. The investigator's role is limited to establishing the facts based on the evidence at hand and the balance of probability. The investigator will report back to the Approved Provider addressing if they have found the allegation to be either substantiated or unsubstantiated.

The Approved Provider will review the findings of any investigation and provide an outcome to the complainant.

All finalised documentation and reports will be stored confidentially (refer policy [7.6 Privacy and Confidentiality of Records](#)).

Reporting Obligations

The Approved Provider will ensure that any complaint that meets the criteria relevant to R.175 (2)(d) (e) and R.176 (2)(b) is reported within 24 hours to the Regulatory Authority through the NQAITS portal.

If the complaint is in relation to Child Care Subsidy and suspected fraud, the Approved Provider will notify the Department of Education Skills and Employment through the National Tip Off Line 1800 664 231, via email tipoffline@education.gov.au or anonymously through the online reporting tool.

Child Protection and Safety

If the concern relates to a child protection matter, the complainant will be informed that the Service is obligated to report any suspected abuse (Child Protection Act 1999) immediately to the Department of Child Safety, Police and the Regulatory Authority.

The Service will not investigate this matter; however, it will suspend the educator related to this complaint until the matter is investigated and will only reinstate if the complaint is not substantiated and at the discretion of the Approved Provider.

Serious Breach

If the complaint is about inappropriate practices or a serious breach of the Education and Care Services National Law and Regulations that puts a child at risk of harm, for example, inappropriate discipline was used or any other matter pertaining to the health and safety of a child, the service is obligated to notify the Regulatory Authority within 24 hours.

Instances of inappropriate conduct reported to the Approved Provider will be taken seriously and fully investigated. The Approved Provider is required to make notification to the Reportable Conduct Scheme within three days of receiving a report of inappropriate conduct.

Continuous Improvement

The Nominated Supervisor and Approved Provider will review the complaints register periodically to identify opportunities to enhance the quality and address systemic issues not yet identified. This proactive approach is essential for continuously improving child safety and wellbeing practices, and for creating a more inclusive and culturally safe environment for everyone.

The Service recognise complaints as a positive resource for self-assessment to inform the service's philosophy, quality improvement planning and the review and development of policies and procedures. We are constantly reviewing the environment in which we operate to enable continuous improvement and use complaints and/or grievances as a basis for this by:

- Seeking feedback from the complainant and respondent about processes and systems through a survey or phone interview.
- Identifying the complaint or grievance and reflecting on how staff, educators and processes (policies and procedures) influenced or impeded the complainant's experience. We can then share this with staff at meetings (using redacted names) to identify, plan and implement improvements.
- Reflecting on and considering what has been learnt about the service systems, processes, policies, and procedures as a result of a complaint or grievance. We ask: How can the experience of others be improved? What could be done better and what required attention and when?

Reflection and feedback is collected in staff meeting minutes and followed up and added to our Quality Improvement Plan (QIP) where relevant.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - S.166A Offences relating to inappropriate conduct
 - s.172 Offence to fail to display prescribed information
 - s.173 Offence to fail to notify certain circumstances to Regulatory Authority
 - s.174 Offence to fail to notify certain information to Regulatory Authority
- **Education and Care Services National Regulations:**
 - R.157 Access for parents
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.173 Prescribed information to be displayed
 - R.174 Time to notify certain circumstances to Regulatory Authority
 - R.174 A Prescribed information to accompany notice
 - R.176 Time to notify certain information to Regulatory Authority
 - R.183 Storage of records and other documents
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [National Principles for Child Safe Organisations](#)
- Department of Education - [Child Care Provider Handbook](#)
- [Human Rights Act 2019 \(Qld\)](#)
- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[4.6 Code of Conduct](#)

[5.1 Interactions and Relationships with Children](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.5 Governance and Management](#)

[7.6 Privacy and Confidentiality of Records](#)

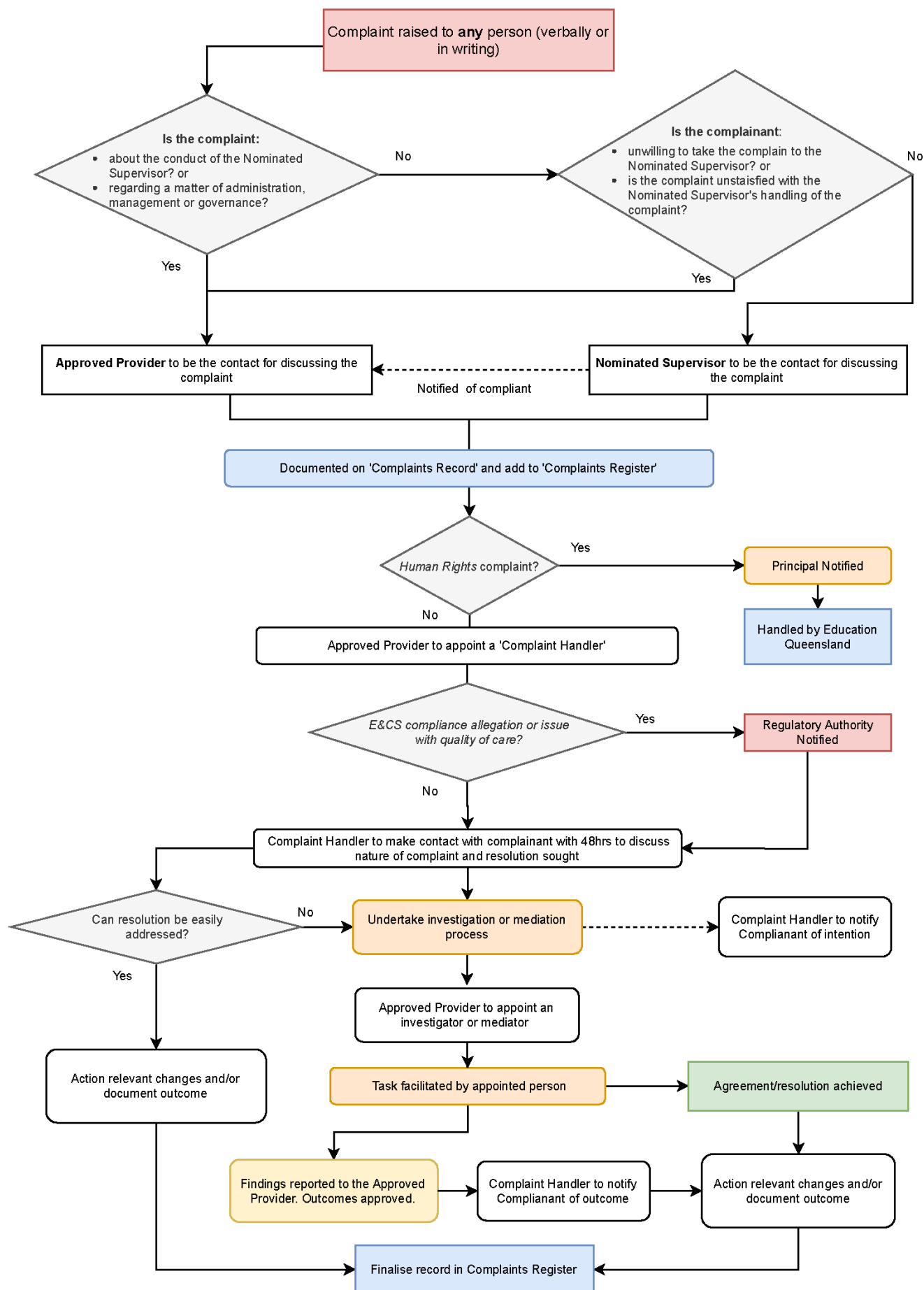
[7.7 Managing Notifications](#)

Forms and Resources

[Complaint Record](#)

Policy 6.7 Feedback and Complaints Handling		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Address regulatory changes		
V1-06.2024 – No updates		
V2-03.2025 – Added additional information for AP, NS roles and responsibilities and added families, Added additional procedures relevant to employees.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced key tasks and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards.		
V4-04.2026 – added procedures relevant to reporting obligations, serious breaches and continuous improvement		

6.7.1 Complaint Handling Flowchart



6.8 Visitors

Policy Statement

The Approved Provider seeks to provide an open and friendly environment, which values and actively encourages community participation and inclusion. In doing so, the Service is encouraged to welcome visitors as part of the service program and operations, extending our commitment beyond compliance and building a proactive culture of child safety, wellbeing, and cultural safety, in a safe and supervised environment.

This policy aligns with the Queensland Child Safe Standards and the National Principles for Child Safe Organisations and reinforces the Approved Provider's commitment to child safe practices. The Approved Provider further implements best practices by incorporating the National Model Code for the taking of images and videos of children to ensure safe environments for children are maintained.

All visitors (and non-authorised persons) will remain in direct supervision by an educator while children are attending the service. Children will never be left alone with a visitor

Definitions

Visitors: are defined as all people other than:

- Employees,
- Children enrolled and attending the service; and
- Parents/guardians, or authorised persons delivering or collecting children from the service.

Tradesperson/Contractor: A person hired to perform specific work or provide services under a contract, not an employee.

Roles and Responsibilities

Approved Provider	• Establish effective procedures to ensure suitable persons interact directly with children being cared for by the service, including a clear process for suitability checks and monitoring of visitors. • Establish comprehensive induction and orientation procedures to ensure Educators are advised of their responsibilities relating to visitors at the service when care is being provided. • Establish mechanisms to uphold the safety and protection of children being cared for by the service. • Establish procedures to ensure the presence of visitors to the Service is recorded and maintained.
Nominated Supervisor	• Provide supervision and leadership to ensure established procedures are followed and that all staff are confident and competent in managing visitors and responding to any concerns. • Verify Working with Children Checks (Blue Cards) of visitors and contractors (where required) via the Blue Card Services online portal before the visitor or contractor commences any activity. (A Blue Card Services '<i>Restricted employment and restricted person declaration</i>' will need to be completed by the worker, if they do not hold a valid blue card). • Ensure all visitors and contractors sign the visitor register on arrival. • Ensure all visitors and contractors are appropriately supervised by an Educator at all times and the health, safety and wellbeing of children at the service are protected. • Ensure visitors don't smoke tobacco or use vaping devices or substances or be under the influence of alcohol or drugs at any time they are in attendance at the Service • Ensure visitors are aware of the service's child safe practices and not to use a personal digital device to take any images or videos of children in care

	• Notify the Approved Provider of any pending visits by a tradesperson to the Service during operating hours and ensure a risk assessment is completed (where necessary) and approved by the Approved Provider. • Respond promptly to any child safety concerns involving visitors or contractors.
All Staff	• Ensure children are not left unsupervised with visitors or unauthorised persons. • Support all visitors to present to the OSHC office to be signed in/identified. • Monitor for and respond to situations that might risk the safety, wellbeing or cultural safety of children. This includes being vigilant for signs of any inappropriate interactions.
Visitors	• A Blue Card is required by anyone whose business provides any services or activities (work) within the Service premises while children are present • Complete a Blue Card Services '<i>Restricted employment and restricted person declaration</i>' if deemed necessary by the Approved Provider or Nominated Supervisor. • Complete the Record of Visitors on arrival and departure to the Service. • Refrain from smoking tobacco or using vaping devices or substances or be under the influence of alcohol or drugs at any time while attending the Service. • Not take any photos, videos, or audio recordings of children in care unless explicit permission has been granted by the Nominated Supervisor and the child's parent/guardian. • Always abide by the Service procedures while in attendance and care is being provided. • Remain under the direct supervision of the designated educator at all times. • Interact with children in care with kindness, respect and consideration for their culture, religion, attitudes, and belongings. • Never be left alone with children who are in care at the Service. • Obtain a Working with Children Check if a regular or frequent visitor to the Service while care is being provided. • Maintain responsibility for the care of any children brought with you to the Service. • Maintain confidentiality and privacy at all times in regard to children, families and educators (unless this constitutes a child safe or protection issue, this must be reported to the Nominated Supervisor immediately).

Procedures

Any persons unknown to educators of the service will be requested to present to the OSHC office in order to identify themselves. Where necessary, the Nominated Supervisor or Responsible Person will confirm their identity with enrolment records. This process ensures the protection of all children, particularly by preventing contact from individuals with no legitimate reason to be at the service.

Visitors will be made aware:

- of the Service Code of Conduct which emphasises in relation to appropriate and respectful behaviour, cultural sensitivity and maintaining professional boundaries around children in care, in accordance with our commitment to child safe practices.
- they must not smoke tobacco or use vaping devices or substances or be under the influence of alcohol or drugs at any time while attending the Service.
- They must not take any photos, videos, or audio recordings of children in care unless explicit permission has been granted by the Nominated Supervisor and the child's parent/guardian.

The Service's emergency management procedures will ensure that any visitors in the Service at the time of any emergency or practice drill are recognised and appropriately catered for.

Visitors to the Service will not be privy to information of a confidential nature unless they have authority by law or written permission has been previously obtained from the family or staff member.

Working With Children Check (Blue Card)

Visitors to the Service may be required to hold a Working with Children Check (Blue Card) and if so, will be requested to provide the visitor's Working with Children Check (Blue Card) prior to interacting with any children.

If deemed necessary by the Approved Provider, visitors will be asked to complete a Blue Card Services 'Restricted employment and restricted person declaration'. This form confirms a person's eligibility to work/volunteer in restricted employment and declare they are not a restricted person under the Working with Children (Risk Management and Screening) Act 2000.

Record of Visitors

The *Record of Visitors Form* must be completed by all visitors to the Service, even during times outside the service operating hours when no children are in care. This record serves as a vital tool for ensuring accountability and transparency, in line with our child safety obligations and must include:

- Name of the visitor
- Time of arrival and departure
- Reason for the visit
- Their contact details
- Visitor's signature.

Visitors do not include:

- Families or authorised nominees that are signing the children in and out on the attendance record,
- Educators attending the service to complete their rostered shift.

Steps to Protect Children at the Service

Invited visitors

A Risk Assessment and Management Plan will be completed for all circumstances where visitors are invited to attend the Service, such as incursion providers or other community members supporting the service's program. Information will include details of their arrival, the estimated period they will be staying at the Service and the type of activities they will be undertaking. Regardless of their engagement, where children are being provided education and care, an educator will remain in direct supervision at all times.

Children will be informed in advance of any scheduled visitors and prepared in a developmentally appropriate way, where applicable.

Educators will ensure that visitors to the Service are not left alone with any children at any time. This is a non-negotiable requirement for child safety.

Visitors must not under any circumstances undertake any care-related activities with or for a child being cared for by the Service. This includes but is not limited to assisting with toileting and personal care or being left alone in a room without the supervision of an Educator. Any breach of this will be considered a serious child safety concern.

Educators will monitor visitor interactions and ensure visitors do not take any photos, videos, or audio recordings of children in care are taken unless explicit permission has been granted by the Nominated Supervisor and the child's parent/guardian.

School Community Members

At times teachers or other relevant school community members may be in the vicinity of the Service's activities. The Service welcomes collaboration and participation by the school community but will ensure that where children are being provided education and care, an educator will remain in direct supervision at all times.

Contractor/Tradesperson

The Service will liaise with the school and schedule any required work outside of the service operating hours, where possible.

If work must be conducted during service operating hours:

- A Blue Card will be required by anyone whose business provides any services or activities (work) within an education and care service premises while children are present.
- In addition, the Nominated Supervisor will assess the risk (on a case by case basis) and develop a risk assessment, if necessary.
- When required, Educators will ensure children are in a different approved area of the ECS away from a tradesperson or other visitor who is present to undertake work of any kind.

Where the contractor/tradesperson does not have a valid Blue Card, regardless of it being planned or emergency works, the Nominated Supervisor will ensure a Blue Card Services 'Restricted employment and restricted person declaration' is completed and kept on file.

Personal Devices

As per the Service's policy [2.16 Safe Use of Digital Technologies and Online Environments](#), visitors to the service will not be permitted to take any photos, videos, or audio recordings of children in care unless explicit permission has been granted by the Nominated Supervisor and the child's parent/guardian.

Suspicious or Harassing Persons

Any persons who do not have a valid or suitable reason for being on the premises will be respectfully asked to leave by the Nominated Supervisor, or where this is not practicable any other educator.

Where any educator is suspicious or reasonably believes there may be a potential threat to safety or wellbeing of any persons, the service's *Lockdown Plan* will be initiated (refer policy [2.13 Emergency, Evacuation, Lockdown and Drills](#)). Staff are empowered and obligated to act immediately on any suspicion of a threat to a child's safety, and to report all incidents and concerns to the Nominated Supervisor.

Record Keeping and Confidentiality

The Nominated Supervisor must ensure the *Record of Visitors Form* is accurate with all relevant information completed. This is a mandatory requirement to maintain compliance with the Education and Care Services National Regulations.

All written visitor records will be retained by the service for three years after the record was made. If any part of the visitor record relates to an allegation of child sexual abuse, that part of the visitor record is to be kept for the timeframe required for these types of records.

Information kept in a record required under the National Regulations will not be divulged or communicated, directly or indirectly, to another person other than in the circumstances outlined at Regulation 178 (4), 181 and 182. This ensures that sensitive information is handled with the utmost confidentiality, in line with legal and ethical obligations.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.170 Offence relating to unauthorised persons on education and care service premises
- **Education and Care Services National Regulations:**
 - R.157 Access for parents
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.173 Prescribed information to be displayed

- R.174 Time to notify certain circumstances to Regulatory Authority
- R.174A Prescribed information to accompany notice
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA6 – Collaborative partnerships with families and communities

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Privacy Act 1988 \(Cth\)](#)
- [Work Health and Safety Act 2011](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[2.1 Providing a Child Safe Environment](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.5 Governance and Management](#)

[7.6 Privacy and Confidentiality of Records](#)

Policy 6.8 Visitors		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V1-03.2025 – No updates		
V2-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards.		
V3-04.2026 – Updated policy statement, additional definitions, added visitors and enhanced roles and responsibilities, added procedures relevant to working with children check (Blue Card), record of visitors, steps to protect children at the service, contractor/tradesperson, personal devices and record keeping and confidentiality,		

6.9 Childhood Immunisation

Policy Statement

The Approved Provider acknowledges their obligation under the Education and Care Services National Regulation 2011, in ensuring that children are free from the risk of harm and recognise that immunisations protect children while their immune systems are still developing and prevent them from getting serious diseases. This extends to limiting exposure to health and safety risks that may arise from the incidence of vaccine-preventable diseases. Our primary commitment is to the safety and wellbeing of all children in our care, including those who may be more vulnerable to infectious diseases.

Upon enrolment, the Service will request parents/guardians to provide their child's immunisation history statement, in order to determine if enrolment and subsequent attendance will be accepted.

Roles and Responsibilities

Approved Provider	• Ensure obligations under the Education and Care Services National Law and National Regulations are met • Establish procedures to document children's immunisation status to manage the outbreak of infectious disease • Ensure procedures are clear and consistently applied, while being sensitive to the diverse beliefs and circumstances of families.
Nominated Supervisor	• Collaborate with families in the collection of immunisation history information, providing clear and accessible information to help families understand the policy and why it is in place. • Ensure records are maintained and stored to protect the privacy of families. • Communicate the policy and potential exclusion of children in the event of an outbreak of infectious disease. • Display wall charts about childhood immunisation schedules in the parent sign in area • Contact the parent/guardian of a child not immunised against a vaccine-preventable disease that has been detected at the Service, and request the child be collected as soon as possible
Families	• Provide accurate and current information regarding the immunisation status of their child/ren when they enrol, and inform the Service of any subsequent changes to this while they are enrolled at the service • Provide the Service with an updated copy of their child's current immunisation record. • Keep their child/ren at home when an infectious disease has been diagnosed at the Service and their child is not fully immunised against that infectious disease, until there are no more occurrences of that disease, and the exclusion period has ceased.

Procedures

Under the Public Health Act 2005, approved early childhood education and care services (ECEC services) can refuse the enrolment or attendance of children who are not up to date with their scheduled vaccinations as per the National Immunisation Program. All children must meet the Australian Federal Government's immunisation requirements or have a valid exemption for the family to be eligible for Child Care Subsidy (CCS).

Through the Service enrolment procedures, parents/guardians will be requested to provide a copy of their child's immunisation history statement. This information will be recorded with the children enrolment details and stored in accordance with the procedures outlined in policy [7.6 Privacy and Confidentiality of Records](#)

This policy will be available to parents/guardians on request. Information will also be provided to families via the Service *Family Handbook* and the service's communications will detail the potential impacts on their child's enrolment or attendance if their child's immunisation status is deemed not up to date.

The Service will establish risk management procedures relating to monitoring and managing the spread of vaccine-preventable diseases at the service, this is outlined in policy [2.7 Infectious Diseases](#). This is a critical child safety measure aimed at protecting the entire service community, particularly those with compromised immune systems.

Procedures will include but not limited to:

- Monitoring and recording children immunisation status through enrolment,
- Monitoring and recording staff immunisation status,
- Communication regarding infectious disease outbreak and management; and
- Limiting attendance for vulnerable children during times of infectious disease outbreak (if enrolment has been accepted).

Immunisation History Statement

The Nominated Supervisor will request copies of each child's immunisation history upon enrolment. Where a family chooses to refuse to provide a copy of the immunisation history, it will be assumed the child has no immunisation history and may be excluded from the service in the event of an infectious disease outbreak (refer policy [2.7 Infectious Diseases](#))

- An immunisation history statement says whether a child's immunisation status is up-to-date or not up-to-date. This can be:
 - an official record issued by the Australian Immunisation Register
 - a letter from a recognised immunisation provider (e.g. a GP or immunisation nurse).
- The Personal Health Record (the 'red book') from Queensland Health is not acceptable proof of immunisation because it only contains handwritten updates.

Vulnerable Children

For child/ren who do not have a current immunisation history statement on file, their immunisation status will be considered 'unknown' or 'not up-to-date', until such time as the correct immunisation documentation is provided. When communicating with families about this, the service will do so with empathy and cultural sensitivity.

If the parent/guardian does not provide the child's immunisation history statement within the reasonable timeframe allowed, the child's enrolment may be:

- Refused or cancelled,
- Accepted with conditions, such as attendance refused until an Immunisation History Statement or other documentation from a recognised immunisation provider demonstrates full immunisation status; or
- Accepted, with specific conditions in place. Specific conditions may include restricting care during an outbreak of infectious disease at the service.

Families of vulnerable children (i.e. those children whose immunisation status is deemed 'not up to date') whose enrolments have been accepted (with or without conditions) will not be eligible for Child Care Subsidy (CCS)

Medical Contraindication

Enrolment and/or attendance for a child cannot be refused on the basis of their immunisation status if they have a medical contraindication to some or all scheduled vaccines. Whilst not technically vaccinated, these children are still classified as having an 'up-to-date' immunisation status and this should be indicated on their immunisation history statement.

Conscientious Objection

Children of families who have recorded a conscientious objection to vaccination through the 'Australian Childhood Immunisation Register' will have their immunisation status registered as 'not up-to-date'. Acceptance or refusal of enrolment will be as per the procedures of this policy relating to vulnerable children.

The service will approach these situations with an understanding of a family's right to make choices, while upholding its duty of care to ensure the safety and wellbeing of all children.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
 - S.167 Offence relating to the protection of children from harm and hazards
 - S.175 Offence relating to requirement to keep enrolment and other documents
- **Education and Care Services National Regulations:**
 - R.86 Notification to parents of incident, injury, trauma and illness
 - R.87 Incident, injury, trauma and illness record
 - R.88 Infectious diseases
 - R.162 Health information to be kept in enrolment record
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.173 Prescribed information to be displayed
 - R.175 Prescribed information to be notified to the Regulatory Authority-
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA3 – Physical environment
 - QA4 – Staffing arrangements
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [A New Tax System \(Family Assistance Administration\) Act 1999](#)
- [Public Health Act 2005 \(Qld\)](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[2.7 Infectious Diseases](#)

[2.8 Hygiene, Health and Wellbeing Practices](#)

[6.2 Enrolment and Orientation](#)

[6.4 Acceptance and Refusal of Authorisations](#)

Policy 6.9 Childhood Immunisations		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V1-03.2025 – No updates		
V2-10.2025 – Enhanced policy statement, added family and enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards.		
V2-04.2026 – No updates		

6.10 Children's Property and Belongings

Policy Statement

The Service acknowledges that children will bring to OSHC or carry with them certain items of personal belongings. This policy and procedure details the types of belongings that children are required to bring to participate effectively in the program as well as other items they may bring with them on a regular basis.

The Service also recognises that there is level of responsibility associated with bringing those belongings and these procedures aim to clarify those responsibilities for all stakeholders while prioritising the safety and wellbeing of all children and ensuring a culturally safe environment for everyone.

Roles and Responsibilities

Approved Provider	• Establish effective policies to manage the expectations of belongings, with a clear focus on prohibiting items that could pose a risk to child safety or wellbeing. • Implement communication systems to support information sharing among stakeholders • Ensure there is adequate and sufficient storage space for children's personal belongings.
Nominated Supervisor	• Provide clear communication to families on the expectations for personal belongings. • Establish guidelines for responsibilities related to children's personal belongings. • Ensure there is adequate and sufficient storage space for children's personal belongings. • Provide appropriate storage for lost property that will be available to children and families • Manage any grievances or concerns related to lost, damaged, or stolen property of children, ensuring all concerns are treated seriously and with an understanding of their potential impact on a child's wellbeing. • Inform families through relevant newsletters and publications such as the Family handbook of appropriate personal belongings required at the Service each day
All Staff	• Follow the service's policies to guide children's' management and care for personal items. • Encourage children to put their belongings away as necessary. • Manage the service lost property items as required. • Be vigilant for any personal belongings that may present a risk of harm, bullying, or cultural insensitivity, and respond appropriately.
Families	• Provide their child with the required items as required to effectively participate in the service's program of activities and experiences. • Ensure all personal property and belongings are clearly named or labelled • Communicate specific needs of each child directly with educators, especially in regard to items with cultural or personal significance that require special care or understanding. • Encourage child/ren to leave special and/or expensive items at home. • Monitor the lost property area for items that belong to your child/ren

Procedures

In consultation with parents/guardians, the Service allows children to bring personal belongings to share with others and understands that children may frequently have items in their bag that they have taken to school for news. Items may include special items from gifts, holiday souvenirs, or items relating to a current interest. Parents /guardians must approve these items being brought to the Service and they must be considered safe for all children to hold or view. The service also reserves the right to ask for an item to be

Sherwood State School OSHC Policies and Procedures – V5-04.2026

put away if it is deemed to be a risk to a child's safety or wellbeing, or if it is culturally inappropriate or insensitive.

As part of the service program, the Service will facilitate opportunities for children to share their toys/news items with others to encourage:

- children's social development
- the development of language skills, supporting children to verbalise thoughts, fears, and feelings
- the cultural and social understandings of all children involved in group time activities and
- development of special interests for the group that could be extended through the program.

Throughout special program times, i.e. Vacation Care or Pupil Free Days, children may be able to bring with them personal belongings other than typical items (e.g. games and toys). This will be done solely at the discretion and responsibility of the parent/guardian.

Educators will encourage children to care for their belongings as appropriate however, no responsibility will be taken by the service or Educators for any items brought to the Service which become lost or damaged as a result of children's inability to care for them.

Children's Required Belongings

The family will be responsible for providing the child with appropriate belongings and property required for active participation in the service. Such property may include (but is not limited to):

- Footwear,
- Clothing,
- Hats (and sun safety equipment); and
- Bags, lunch boxes and water bottles.

Parents/guardians will be asked that all personal property and belongings are clearly named/labelled.

Parents/guardians will be informed through relevant communication of any additional appropriate personal belongings required at the service for special events etc. Additionally, clear information will be provided on any items that might interfere with the program and will guide families for these items to remain at home.

At times children may wear dress-up clothes to the Service for specific vacation care days or special occasions. Any dress-ups or costumes will need to be appropriate for safe play and meet sun safety requirements.

Medications required for children whilst at the Service **must not** be kept in their bag and **must** be handed to an Educator on their arrival at the Service.

Mobile Devices

The Service understands and accepts that parents/guardians often provide a mobile device for their child/ren to provide personal security and safety whilst they travel to and from school. However, our program provides a balance of activities for children where a mobile device is not required therefore, parents/guardians and children will be strongly encouraged not to bring mobile devices such as iPads, game consoles and mobile phones to the Service. If a child must bring a mobile device for any reason, appropriate storage will be determined in consultation with the Nominated Supervisor and parents/guardians. This measure is to minimise the risk of bullying, theft, and exposure to inappropriate content, in line with our child safety and wellbeing commitments.

Should children require internet access to complete homework assignments whilst attending the Service they will be able to access computers and other technological devices within our Service. Written parental consent will be required for children to access digital technology while at the Service.

Some children with a disability or health condition, may rely on the use of a mobile device for support needs and will be exempt from this requirement. Exemptions will be made after consultation with the Nominated Supervisor, clearly documented in the child's enrolment record. The child's health and medical risk

minimisation plan will clearly identify strategies for the use of mobile devices to ensure they are utilised effectively to support the child's needs

Where the Service permits the use of children's personal mobile devices during the program, parents/guardians must ensure any personal mobile devices where children have access to the internet are enabled with parental controls and filtering software installed to prevent access to inappropriate content. Educators are not available to monitor usage of children's personal mobile devices with access to internet and/or social media while at the service, refer policy [2.16 Safe Use of Digital Technologies and Online Environments](#) for further guidance.

Care for Belongings

The Service will not take responsibility for any of the children's personal property or belongings but will endeavour to:

- Actively encourage children to care for their belongings, which promotes a sense of personal responsibility and respect for property,
- Remind children when belongings need to be placed in storage, e.g. lunch box into bag,
- Provide suitable storage to keep safe (at parent/guardian /family or child request) any item of personal belonging which is either special, expensive or at risk of being damaged,
- Ensure that participation in service activities and experiences does not wilfully damage belongings, and
- Provide protective equipment such as painting smocks for relevant activities.

Families will be asked to consider leaving excessive or non-essential belongings at home.

Lost property

Un-named items will be placed in a central location for families to check and take items that belong to their child. Lost property unclaimed after three months will be used by the service as spare clothing or given to charity.

Parents/guardians are asked to let staff/educators know if an item belonging to their child is missing or return items that do not belong to their child. Staff/educators will undertake a search for the missing item and place a notice up for other parents/guardians, asking if they have taken the item home by mistake.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations:**
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety

Additional Regulatory Context and Guidance

- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[1.1 Educational Program Development and Implementation](#)

[2.1 Providing a Child Safe Environment](#)

[6.5 Interactions and Communication with Families](#)

Policy 6.10 Children's Property and Belongings		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V2-03.2025 – Amended policy statement, added additional information for all roles and responsibilities and added families, added additional procedures relevant to children's belongings and mobile devices.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards.		
V3-04.2026 – No updates		

6.11 Cultural Safety

Policy Statement

The Approved Provider is committed to fostering a culturally safe, respectful, and inclusive environment for all children, families, educators, and community members, with particular acknowledgment to the rights and needs of Aboriginal and Torres Strait Islander people, recognising their connection to Country and the importance of cultural identity. Cultural safety is fundamental to the wellbeing and protection of children, and is embedded into the Service's policies, everyday practices, and relationships.

Cultural safety extends beyond simply preventing harm, it involves actively recognising, respecting, and celebrating cultural diversity. It fosters an environment where children, families, and educators are empowered to express and honour their cultural identities, knowing they are respected and included. Genuine cultural safety is achieved when every individual feels valued, accepted, and free to be their authentic self without fear of discrimination, judgment, exclusion, challenge, or denial of their identity or needs.

The purpose of this policy is to uphold and promote the cultural rights of every child by embedding culturally safe practices throughout all areas of the Service and taking proactive steps to prevent racism and discrimination. It provides guidance for educators, volunteers, and stakeholders to implement respectful, inclusive, and culturally responsive practices that create a welcoming and supportive environment for all children, families, and educators.

Roles and Responsibilities

Approved Provider	• Ensure policies and practices uphold the rights of Aboriginal and Torres Strait Islander children and all children from culturally and linguistically diverse backgrounds. • Promote and embed a culture of respect, equity, and cultural safety across all levels of Service operations. • Provide professional development and training in cultural safety, anti-bias education and inclusive pedagogy. • Ensure community consultation and input informs Service delivery. • Ensure all educators and staff have access to curriculum resources and training that reflect diverse perspectives and promote cultural safety.
Nominated Supervisor	• Lead a culturally responsive curriculum and ensure cultural safety is embedded in daily practice. • Maintain up-to-date knowledge of cultural safety. • Encourage respectful relationships between families, children, educators, staff, and the community. • Facilitate an inclusive enrolment and orientation process that acknowledges and celebrates family diversity. • Promote respectful recognition of Aboriginal and Torres Strait Islander cultures and protocols (e.g. Acknowledgement of Country).
All Staff	• Treat all children and families with respect and dignity, honouring their cultural identities. • Engage in ongoing critical reflection to challenge personal bias and improve cultural competence. • Build positive relationships with children that acknowledge their cultural background and identity. • Create inclusive learning environments that reflect the cultural backgrounds of children and the broader community. • Actively challenge racism, discrimination, and exclusionary practices.

Key Tasks and Responsibilities

Inclusive Enrolment Practices	The Approved Provider will gather cultural background information and language preferences during enrolment and offer enrolment documentation in home languages where possible. Throughout the enrolment process, the Nominated Supervisor will respect traditional naming conventions, kinship structures, and parenting practices.
Cultural Competence and Professional Learning	The Approved Provider will provide ongoing training for Educators focused on cultural awareness and anti-bias education and inclusive practices. The Nominated Supervisor will engage the Educator team in reflective practices and team discussions to strengthen cultural competency and will aim to collaborate with local Aboriginal and Torres Strait Islander community representatives and cultural organisations to inform practice and build relationships.
Feedback and Collaboration with Families	The Approved Provider will actively seek family input into curriculum, menu planning and Service design and use the enrolment process, surveys, meetings, and informal conversations to understand family expectations and cultural values. The Nominated Supervisor will encourage families and the community to share cultural knowledge through the program using storytelling, music, cooking and/or incursions.

Procedures

Embedding Cultural Safety

Cultural safety is a foundational practice of the Service and is intentionally embedded across all aspects of operations, environments, programming, and relationships. It reflects the commitment to honouring the cultural identities, languages and lived experiences of all children, families and communities particularly Aboriginal and Torres Strait Islander people. The Service achieves this through:

- Creating an environment that reflects the cultures, languages and traditions of the children and families of the Service.
- Using culturally respectful language and pictures in all communications, displays, and documentation.
- Consulting with local Aboriginal and Torres Strait Islander communities or cultural advisors when developing materials that reference culture, history or identity.
- Respecting naming protocols, including the use of correct terminology, for example Aboriginal and Torres Strait Islander peoples rather than outdated or collective terms.
- Planning experiences that honour children's backgrounds, including storytelling, music, food, and celebrations in consultation with families.
- Conducting a regular Acknowledgement of Country with children to recognise the Traditional Custodians of the Land and foster genuine respect for Aboriginal and Torres Strait Islander cultures.
- Engaging in reflective practice and professional learning to deepen understanding of cultural safety, intergenerational trauma, and inclusive pedagogy.
- Building partnerships with families and communities, including local First Nations organisations, to ensure cultural knowledge is respectfully shared and embedded.

Embedding cultural safety is a continuous process built on respect, reflection and accountability. Educators are responsible for creating environments that affirm children's identities and reflect the diversity of Australia's communities.

Cultural Awareness and Cultural Competence

Cultural safety begins with awareness and grows through competence. Cultural awareness involves recognising that different cultures exist and understanding some of their values, beliefs and customs. It is the foundation for respectful engagement and helps educators appreciate the diverse backgrounds of

children, families and staff. Cultural competence is an ongoing process of learning about different cultural perspectives and developing the skills, attitudes, and knowledge to respond appropriately and respectfully. It requires self-reflection, openness and a commitment to adapting practice in response to the needs and strengths of diverse communities.

Cultural Identity

Every child has the right to enjoy their culture, speak their language, and participate in their traditions, as affirmed by the United Nations Convention on the Rights of the Child. This includes maintaining strong connections to family, community, and Country particularly for Aboriginal and Torres Strait Islander children. It is recognised that cultural identity is not static or symbolic, it is lived, relational and deeply personal. Affirming cultural identity means creating environments where children see their cultures reflected and respected in everyday practice.

Culturally Inclusive Enrolment and Orientation

The Service is committed to ensuring the enrolment and orientation process is welcoming and inclusive for all families. Families are encouraged to share cultural information during enrolment, such as home language, cultural or religious practices, family structure, and celebrations. This information will be respectfully recorded and shared with the Educator team to support culturally responsive practice. Where needed, enrolment forms, family handbooks, and other key documents will be offered in alternative languages or with appropriate support. The Service will also recognise and respect traditional naming conventions, kinship systems, and family roles as an essential part of culturally inclusive practice.

Family Engagement and Cultural Collaboration

Families are valued as active partners in their children's learning and are regularly encouraged to share their cultural knowledge, traditions and practices. This may include contributing traditional recipes, music, artefacts, cultural stories, or participating in cultural celebrations and events. Educators will intentionally create ongoing opportunities for these contributions to be meaningfully embedded within the curriculum and daily Service practices. The Service will always seek consent before sharing any cultural information provided by families and will ensure all contributions are acknowledged respectfully, authentically and without tokenism.

Staff Induction, Training and Reflection

All educators, staff and volunteers play an essential role in upholding children's rights and fostering respectful, inclusive relationships. During induction, staff receive an overview of the Child Safe Standards, specifically Standard 1 – Culturally Safe Environments and Standard 4 – Equity and Diversity. Ongoing training and professional development are provided with a particular focus on cultural safety, anti-bias education and inclusive pedagogy.

Educators are expected to engage in regular reflective practice to explore your own culture, history, biases and assumptions, and to consider how these influence their interactions and decisions. The Nominated Supervisor will ensure dedicated time for team reflections and discussions related to cultural safety, identity and inclusion. These sessions will also provide opportunities to share cultural knowledge and perspectives among educators, families and community partners, strengthening understanding and respectful relationships.

Cultural Responsiveness in Environments and Resources

The Service is committed to creating physical and social environments that reflect, respect and celebrate the culture diversity of children, families and the wider community. All learning spaces, materials, and media promote inclusion, respect and cultural safety.

Resource selection and environmental design will be regularly reviewed as part of program evaluation to ensure they remain culturally relevant, safe and responsive to the community context. Educators will ensure books, music, posters, games, learning tools and visual displays are inclusive, accurate and free from stereotypes. Materials will reflect not only cultural events and traditions but also the everyday lived experiences of diverse communities, including Aboriginal and Torres Strait Islander perspectives.

Cultural perspectives will be meaningfully embedded across curriculum planning to ensure diversity is integrated throughout all areas of learning, not treated as an add-on or occasional focus.

Responding to Cultural Concerns, Bias or Exclusion

A culturally safe environment is one where all children, families and staff feel respected, valued and protected from discrimination or exclusion. Any concerns related to cultural bias, disrespect or exclusion must be addressed promptly and with sensitivity.

When a cultural concern arises, whether intentional or unintentional, educators must document the incident and follow the procedures as outlined in policy [6.7 Feedback and Complaints Handling](#). Discriminatory behaviour, language, or actions will be managed in accordance with the Code of Conduct, with appropriate disciplinary or educational action taken as required.

The Service may engage community cultural advisors, Elders or representatives to support resolution, provide cultural guidance, and strengthen understanding among educators and families. All concerns will be handled confidentially and respectfully, with a focus on learning, accountability and continuous improvement.

The Service views these situations not only as opportunities to uphold cultural safety but also as moments to deepen collective awareness and strengthen inclusive practice.

Continuous Improvement

The Service is committed to enhancing cultural safety through ongoing reflection, feedback and review. Cultural safety is dynamic, it evolves through relationships, understanding and changing community contexts.

As part of continuous quality improvement process, educators will be supported to critically reflect on their interactions, planning and environments through a cultural safety lens. The Nominate Supervisor and Approved Provider will ensure cultural safety remains a living practice, responsive, relational and central to the wellbeing of every child and family.

These reflections may be documented in the Services Quality Improvement Plan (QIP). Curriculum planning and program reviews will include cultural safety and inclusivity checks to ensure authentic representation and avoid tokenism. Educators are encouraged to maintain reflective journals and participate in reflection meetings focused on identity, inclusion and equity.

Guiding questions for reflection include:

- How often are cultural perspectives meaningfully embedded in the program?
- Are we avoiding tokenism by incorporating lived experiences and community voices?
- Do children see their identities and cultures reflected in our environment?
- Are families invited to share cultural knowledge in ongoing and respectful ways?

Feedback from children, families, educators and community partners will guide updates to practice, policy and professional learning. This ongoing commitment ensures that cultural safety remains a lived, evolving practice, responsive to the strengths, needs and identities of our community.

Reconciliation and Community Partnerships

The Service is committed to reconciliation and to building meaningful, respectful relationships with Aboriginal and Torres Strait Islander peoples. Where appropriate, the Service will develop and maintain a Reconciliation Action Plan (RAP) in consultation with staff, children, families and local Aboriginal and

Torres Strait Islander community representatives. The RAP will outline clear goals, actions and timelines to strengthen respect, relationships and opportunities across the Service.

To support this commitment, the Service will build and sustain partnerships with local cultural organisations, Elders and community leaders to guide culturally safe practices and deepen understanding. Opportunities will be created for children and educators to engage with Aboriginal and Torres Strait Island cultures through storytelling, art, language and connection to Country.

Reconciliation will not be symbolic or occasional – it will be embedded in everyday practice, curriculum and decision making. Educators will be supported to engage in ongoing dialogue, reflection and learning to foster reconciliation and cultural humility. This approach reflects our belief that reconciliation is a shared journey, grounded in truth, respect and action and is essential to creating culturally safe environments for all children and families.

Cultural Load

The Service acknowledges that Aboriginal and Torres Strait Islander staff, families and community members may experience additional pressures when asked to share cultural knowledge, lead cultural activities or respond to cultural matters within the Service. These expectations often placed without adequate support, recognition or compensation.

This burden can occur when individuals are asked to speak on behalf of an entire community or culture or when cultural responsibilities are assumed to be part of someone's role rather than recognised as a distinct and valued contribution.

The Service will ensure that all cultural contributions are voluntary, supported, and respectfully acknowledged, recognising the value of cultural expertise and protecting individuals from experiencing undue cultural load.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.3(2)(a) Ensuring the safety, health and wellbeing of children
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.155 Interactions with children
 - R.156 Relationships in groups
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety
 - QA3 – Physical environment
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Child Safe Standards | Queensland Family and Child Commission](#)
- [Child Safe Organisations Bill 2024](#)
- Approved learning Frameworks
 - [Belonging, Being and Becoming – The Early Years Learning Framework for Australia V2.0, 2022](#)

- [My Time Our Place - Framework for School Age Care in Australia V2.0, 2022](#)
- [Child Protection Act 1999 \(Qld\)](#)
- [Anti-Discrimination Act 1991 \(Qld\)](#)
- [Human Rights Act 2019 \(Qld\)](#)
- [Racial Discrimination Act 1975 \(Cth\)](#)
- [United Nations Convention on the Rights of the Child \(UNCRC\)](#)

Related Policies and Procedures

[1.1 Educational Program Development and Implementation](#)

[2.1 Providing a Child Safe Environment](#)

[2.13 Emergency Evacuation, Lockdown and Drills](#)

[2.14 Child Protection and Mandatory Reporting](#)

[3.6 Resources and Equipment](#)

[4.1 Recruitment and Employment of Educators](#)

[4.6 Code of Conduct](#)

[5.1 Interactions and Relationships with Children](#)

[6.5 Interactions and Communication with Families](#)

[6.6 Community Communication and Participation](#)

[6.7 Feedback and Complaints Handling](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.6 Privacy and Confidentiality of Records](#)

Forms and Resources

Reconciliation Action Plan (where applicable)

Policy 6.11 Cultural Safety		
Version and reason for change	Date Implemented	Date of Review
V1-10.2025 – New policy to align with child safe standards.		
V1-04.2026 – No updates		

Policy Group 7

Governance, Leadership and Administration

The service will implement **quality leadership and management systems** to deliver quality care environments for children's learning and development. Well developed, procedures, well-maintained records, shared values, clear direction and reflective practices enable the service to function as a learning community.

An ongoing cycle of review and improvement, including engagement with families, creates a platform for best practice and excellence.

7.1 Nominated Supervisor

Policy Statement

The Approved Provider acknowledges its obligation to appoint at least one suitable person as the Nominated Supervisor at the Service. The process for appointing the Nominated Supervisor will review all relevant elements of suitability and qualification, with a particular focus on the candidate's demonstrated understanding of and commitment to child safety, wellbeing, and cultural safety.

The Nominated Supervisor will be delegated with the responsibility for managing the day-to-day operations and compliance of the Service, including the implementation and oversight of the service's child safe environment and cultural safety policies and practices. Where the Nominated Supervisor is absent from the service, another suitably qualified and competent educator will be delegated to act as the Responsible Person in charge, who also has a clear understanding of their child safety and wellbeing responsibilities and is equipped to respond appropriately to any child protection concerns.

Roles and Responsibilities

Approved Provider	• Appoint suitably qualified and experienced person/s as the Nominated Supervisor/s of the Service, prioritising candidates with a demonstrated commitment to creating and maintaining a child safe, culturally safe, and child-friendly environment. • Ensure the service operates with a suitable Nominated Supervisor and/or Responsible person at all times. • Maintain records of the appointment and suitability assessment of each Nominated Supervisor, including evidence of their child protection and child safety training and their understanding of child safe and trauma informed practices. • Provide notification to the Regulatory Authority where a change in Nominated Supervisor has occurred. • Ensure the name of the Nominated Supervisor/s is on display in a place where it is clearly visible to anyone from the main entrance of the service. • Provide comprehensive and ongoing training and instruction to the Nominated Supervisor to ensure they know and understand their role and responsibility, including mandatory child protection training and cultural safety training.
Nominated Supervisor	• Agree to their appointment in writing • Participate in all required training provided by the Approved Provider and relevant to their role and responsibility, including regular professional development on child safety, wellbeing, and cultural competence. • Successfully complete an approved child protection course as per s.162A of the Law. • Successfully complete the foundation and advanced child safety training modules as per s.162B of the Law and complete child safety refresher training every two years. • Ensure an appropriate Responsible person is on site in their absence.

Procedures

Responsibilities and Function

The Nominated Supervisor is responsible for overseeing the overall operations and management of the service. They are to supervise the day-to-day events of the service and coordinate relevant management activities always with a primary focus on the safety and wellbeing of all children.

Appointment of the Nominated Supervisor

In determining a person's suitability to hold the role of Nominated Supervisor position, the Approved Provider will ensure that the person/s:

- Are aged 18 years or over,
- Have adequate knowledge and understanding of the provision of education and care to children,
- Demonstrate the ability to effectively supervise and manage an education and care service,
- Maintain a clear compliance history with the National law and other relevant laws,
- Have a clean prohibition history; and
- Have successfully completed a relevant child protection course as per s.162A
- Have successfully completed foundation and advanced child safety training modules as per s.162B of the Law and complete child safety refresher training every two years.
- Hold a current Working with Children Check (Blue Card) and understand their obligations.

Each person offered the role of Nominated Supervisor/s will be deemed suitable by the Approved Provider. The following documents will be completed and retained as evidence for suitability and consent of the appointment:

- Nominated Supervisor Checklist, Delegation and Consent Form
- Nominated Supervisor Compliance History Statement
- Nominated Supervisor Prohibition Notice Declaration
- NS01 Nominated Supervisor Consent Form

If uncertainty or concern arises about a candidate's compliance history the Approved Provider will contact the Regulatory Authority and enquire if the person is subject to a prohibition notice in any state or territory or has been subject to any previous reportable conduct findings.

Suitability Review

Where the Approved Provider has concerns that may impact on the Nominated Supervisor's ability to meet the requirements of their role, a reassessment will be made of the person's suitability to hold the position of Nominated Supervisor of the service. The re-assessment will review previous determinations and other relevant information and evidence of suitability. The Nominated Supervisor Checklist Delegation and Consent Form will be used to review and evidence any suitability reviews. This review will include an assessment of the Nominated Supervisor's ongoing capacity to uphold child safety, wellbeing, and cultural safety principles, and their adherence to implementing child safe practices.

Notification to the Regulatory Authority

When changes occur to Nominated Supervisor appointments at the Service, the Regulatory Authority will be notified through the NQA IT System (refer policy [7.7 Managing Notifications](#)).

Written consent via a completed and signed *ACECQA Nominated Supervisor Consent From NS01* will be attached and submitted to the Regulatory Authority via the NQA IT System.

Record Keeping and Retention

All relevant information relating to the appointment of the Nominated Supervisor will be retained by the Approved Provider (refer policy [7.6 Privacy and Confidentiality of Records](#)) including employee details and consent for appointment (*Regulation 145 & 146*).

Details of the Nominated Supervisor will be added to the National Early Childhood Worker Register within 14 days of their appointment.

Records relating to appointments will be stored in the employee's staff file for the required length of time after their employment has ceased (refer policy [7.6 Privacy and Confidentiality of Records](#)).

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.161 Offence to operate education and care service without nominated supervisor
 - s.161A Offence for nominated supervisor not to meet prescribed minimum requirements
 - s.162A Child protection training
 - s.162B Child Safety training
 - s.174 Offence to fail to notify certain information to Regulatory Authority
- **Education and Care Services National Regulations:**
 - R.24 Application for service approval – centre-based service
 - R.35 Notice of addition of new nominated supervisor
 - R.128B Child protection training
 - R.128D Foundation child safety training
 - R.128E Advanced child safety training
 - R.145 Staff Record
 - R.146 Nominated supervisor
 - R.154A National Early Childhood Worker Register
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- National Quality Standard:
 - QA4 – Staffing arrangements
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [1.1 Educational Program Development and Implementation](#)
- [1.2 Documenting Children's Learning](#)
- [1.3 Sharing the Program and Children's Progress with Families](#)
- [1.4 Excursions, Incursions and Regular outings](#)
- [1.5 Sleep, Rest and Relaxation](#)
- [1.6 Food and Nutrition](#)
- [1.7 Screen-Time and Media Viewing](#)
- [2.1 Providing a Child Safe Environment](#)
- [2.2 Supervision and Educator Ratios](#)
- [2.3 Safe Arrivals and Departures of Children](#)
- [2.4 Incident, Injury, Trauma and Illness](#)
- [2.5 Administration of First Aid](#)
- [2.6 Water Safety](#)
- [2.7 Infectious Diseases](#)
- [2.8 Hygiene, Health and Wellbeing Practices](#)
- [2.9 Medical Conditions in Children](#)
- [2.10 Administration of Medication](#)
- [2.11 Sun Safety](#)
- [2.12 Safe Food Handling, Preparation and Storage \(Food Safety Program\)](#)
- [2.13 Emergency Evacuation, Lockdown and Drills](#)
- [2.14 Child Protection and Mandatory Reporting](#)
- [2.17 Child Safety and Wellbeing](#)
- [3.3 Smoking, Drugs and Alcohol-free Environment](#)
- [3.4 Children's Toileting](#)
- [3.5 Emergency and Safety Equipment](#)

[4.1 Recruitment and Employment of Educators](#)
[4.3 Working with Children Checks and Management](#)
[4.5 Volunteers and Students](#)
[4.6 Code of Conduct](#)
[4.7 Employee Development and Performance Review](#)
[4.8 Employee Qualifications – Monitoring Progress](#)
[4.9 Fitness for Work](#)
[4.10 Managing Employee Underperformance and Misconduct](#)
[4.11 Prevention of Workplace Bullying, Discrimination and Harassment including Sexual Harassment](#)
[5.1 Interactions and Relationships with Children](#)
[5.2 Positive Behaviour Support Practices](#)
[5.3 Supporting Complex Behaviours](#)
[5.4 Supporting Additional Needs with Inclusive Practices](#)
[5.5 Promoting Protective Behaviours](#)
[6.1 Access for Families](#)
[6.2 Enrolment and Orientation](#)
[6.3 Bookings and Cancellations](#)
[6.4 Acceptance and Refusal of Authorisations](#)
[6.5 Interactions and Communication with Families](#)
[6.7 Feedback and Complaints Handling](#)
[6.8 Visitors](#)
[6.11 Cultural Safety](#)
[7.2 Determining the Responsible Person](#)
[7.3 Educational Leader](#)
[7.4 Leading Compliance and Quality Assurance](#)
[7.6 Privacy and Confidentiality of Records](#)
[7.7 Managing Notifications](#)
[7.8 Policy Development, Review and Implementation](#)
[7.9 Budgeting, Procurement and Financial Planning](#)
[7.11 Child Care Subsidy \(CCS\) and Additional Child Care Subsidy \(ACCS\) Management and Compliance](#)
[7.12 Workplace Health and Safety](#)
[7.13 Service Closure](#)
[7.14 Social media and ITC Usage for the Service](#)
[7.15 Self-Assessment and Quality Improvement](#)

Forms and Resources

[Nominated Supervisor Checklist Delegation and Consent Form](#)
[Nominated Supervisor Compliance History Statement](#)
[Nominated Supervisor Prohibition Notice Declaration](#)
[NS01 Nominated Supervisor Consent Form](#)

Policy 7.1 Nominated Supervisor		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V2-03.2025 – Added additional information to all roles and responsibilities, added reference to child protection training		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards.		
V4-04.2026 –enhanced roles and responsibilities, added procedures relevant to National Child Safety Training and National Early Childhood Worker Register, added reference to National Law and Regulations.		

7.2 Determining the Responsible Person

Policy Statement

The purpose of this policy is to ensure the appointment of any Responsible Person at the Service is suitable and able to fulfil the requirements of the role with a primary focus on child safety, wellbeing, and cultural safety.

The day-to-day management and supervision of the Service is a critical aspect of the management and compliance of the service. It is a function that impacts the standard of safety, and the quality of education and care for children and families. This includes actively promoting a child safe culture and ensuring the service is a place where children feel safe, respected, and heard.

The Responsible Person is tasked with managing the operations of the Service for a particular session of care, ensuring that the service adheres to regulatory and policy obligations. They are also the primary point of communication and decision-making during operational hours, in the absence of the Nominated Supervisor. The assessment and appointment of an educator to a Responsible Person role is critical. The person should demonstrate the necessary knowledge, experience and management capability (compliance, leadership, professional judgement and communication skills) to oversee and direct work including the ability to respond to and manage child protection concerns.

Records created to evidence the suitability of an educator to be the Responsible Person will be retained by the service.

Roles and Responsibilities

Approved Provider	• Ensure a Responsible Person is always present at the service while the service is educating and caring for children. • Ensure the suitability and capacity of persons identified to fulfil this role with a specific emphasis on their understanding of and commitment to child safe and trauma informed practices. • Ensure relevant documentation is completed and stored. • Monitor and respond to issues relating to conduct, suitability or underperformance, particularly any conduct that may compromise the safety, wellbeing, or cultural safety of children. • Ensure the name of the Responsible Person in day-to-day charge of the service is displayed at all times in a place where it is clearly visible to anyone from the main entrance of the service. • Provide training on child protection, cultural safety, and the Queensland Child Safe Standards to all staff, including those designated as Responsible Persons.
Nominated Supervisor	• In consultation with the Approved Provider, assess and appoint a suitable person to the role of Responsible Person. The assessment must include an evaluation of the educator's knowledge of child protection and cultural safety. • Document the assessment of their suitability and obtain their written (and informed) consent. • Ensure the candidate has adequate knowledge and understanding of the provision of education and care to children • Ensure the candidate has an ability to effectively supervise and manage an education and care service • Record the dates, days and times each Responsible Person is in day-to-day charge of the service. • Display the name of the Responsible Person in day-to-day charge of the service at all times in a place where it is clearly visible to anyone from the main entrance of the service. • Actively monitor and mentor Responsible Persons to ensure they are fulfilling their child safety and wellbeing obligations.

Responsible Person in Charge	• Successfully complete an approved child protection course as per s.162A of the Law. • Successfully complete the foundation and advanced child safety training modules as per s.162B of the Law and complete child safety refresher training every two years. • Lead and support the team of educators to provide quality education and care, ensuring a safe, inclusive, and culturally respectful environment for all children. • Report to the Nominated Supervisor and/or Approved Provider as required with immediate reporting of any child protection concerns or critical incidents. • Develop a sound working relationship with the Nominated Supervisor debriefing relevant information for further management and support. • Demonstrate ability to understand and apply the service's policies and procedures especially those related to child protection, mandatory reporting, and cultural safety. • Report to critical events with diligence and timeliness. • Notify any circumstances that might impact on their suitability or capacity to the Approved Provider. • Ensure that all children's voices are heard and respected, and that they are empowered to speak up about their safety. • Be a primary point of contact for staff, families, and children regarding child safety and wellbeing concerns.

Key Tasks and Responsibilities

Delegating responsibility	Both the Approved Provider and Nominated Supervisor can assess and appoint a suitable educator to the role of Responsible Person. The assessment of the educator's suitability must be documented, with their written (and informed) consent obtained.
Training and instruction	The Nominated Supervisor is responsible for making relevant training and instruction available for a Responsible Person to understand their role and duties with a particular focus on mandatory reporting, responding to disclosures of harm, and implementing culturally safe practices.
Maintaining records	The Nominated Supervisor will maintain the records associated with the appointment and times an educator acts in this role. These records will include documentation of the Responsible Person's child protection training and cultural safety awareness.

Procedures

Appointing a Responsible Person

Where the Nominated Supervisor (or a representative of the Approved Provider) is not present during a session of care, a Responsible Person must be appointed to be in day-to-day charge of the service.

The suitability of any relevant educators to act in the Responsible Person role will occur from time to time. With the Nominated Supervisor (or the Approved Provider) to undertake a review and offer to act in this capacity. The written (and informed) consent of the educator must be obtained before any allocation.

Assessing Suitability

In determining the Responsible Person, the Approved Provider and/or Nominated Supervisor must determine if that person is suitable. This means considering the capacity of this person to ensure children's safety and wellbeing, having regard to their qualifications, skills, knowledge, work experience and age. This includes the person's:

- Successful completion of a relevant child protection course as per s.162A

- Successful completion of foundation and advanced child safety training modules as per s.162B of the Law and child safety refresher training every two years.
- Understanding of the *Education and Care Services National Law and Regulations*,
- Understanding of other relevant laws and provisions such as Child Protection, Confidentiality, Grievance Management, Work Health, Food Handling, etc.,
- Understanding of the service's policies and the responsibilities of the Responsible Person to carry out key procedures,
- Understanding of mandatory reporting obligations.
- Capacity to implement emergency and evacuation procedures,
- Ability to attend to parents/guardians inquiries and/or concerns (either directly or by referral),
- Capacity to supervise, manage and lead other educators,
- Ability to respond to incidents and critical events,
- Ability to effectively make written records of incidents.
- Demonstrated knowledge of the Queensland Child Safe Standards and how to apply them in practice.
- Proven ability to promote cultural safety and respond to the specific needs of Aboriginal and Torres Strait Islander children.
- Ability to listen to children, take their concerns seriously, and respond in an appropriate way to safeguard their wellbeing.

Training and Instruction

The Nominated Supervisor will be informed by the suitability assessment in creating a relevant training plan for an educator appointed to a Responsible Person duty. They will ensure relevant instructions are available and accessible including updated information on child safety legislation, cultural safety protocols, and the service's child protection policies.

Notice of the Responsible Person

In accordance with regulatory requirements, a sign stating the name and position of the Responsible Person will be displayed at all times children are being educated and cared for.

Where the service has multiple delegated Responsible Persons, this signage will indicate the delegated Responsible person for the current session of care, or part thereof. This signage will be displayed in a location accessible and visible to parents/guardians and visitors to the Service.

Record Keeping and Retention

Using a standardised template, the Service will maintain a record of the educator's suitability and consent to be the Responsible Person (refer policy [7.6 Privacy and Confidentiality of Records](#)). A record of the roster to evidence who the Responsible Person is for each session of care will also be maintained.

Details of the Responsible Person will be added to the National Early Childhood Worker Register within 14 days of their delegated appointment.

Records relating to the delegation of Responsible Persons will be stored in the employee's staff file for the required length of time after their employment has ceased (refer policy [7.6 Privacy and Confidentiality of Records](#)).

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.162 Offence to operate education and care service unless responsible person is present

- s.162A Child protection training
- s.162B Child safety training
- **Education and Care Services National Regulations:**
 - R.117A Placing a person in day-to-day charge
 - R.117B Minimum requirements for a person in day-to-day charge
 - R.128B Child protection training
 - R.128D Foundation child safety training
 - R.128E Advanced child safety training
 - R.145 Staff record
 - R.147 Staff members
 - R.151 Record of educators working directly with children
 - R.150 Responsible person
 - R.154A National Early Childhood Worker Register
 - R.173 Prescribed information to be displayed
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [1.1 Educational Program Development and Implementation](#)
- [1.2 Documenting Children's Learning](#)
- [1.3 Sharing the Program and Children's Progress with Families](#)
- [2.1 Providing a Child Safe Environment](#)
- [2.2 Supervision and Educator Ratios](#)
- [2.3 Safe Arrivals and Departures of Children](#)
- [2.4 Incident, Injury, Trauma and Illness](#)
- [2.5 Administration of First Aid](#)
- [2.6 Water Safety](#)
- [2.7 Infectious Diseases](#)
- [2.8 Hygiene, Health and Wellbeing Practices](#)
- [2.9 Medical Conditions in Children](#)
- [2.10 Administration of Medication](#)
- [2.11 Sun Safety](#)
- [2.12 Safe Food Handling, Preparation and Storage \(Food Safety Program\)](#)
- [2.13 Emergency Evacuation, Lockdown and Drills](#)
- [2.14 Child Protection and Mandatory Reporting](#)
- [2.17 Child Safety and Wellbeing](#)
- [3.3 Smoking, Drugs and Alcohol-free Environment](#)
- [3.4 Children's Toileting](#)
- [3.5 Emergency and Safety Equipment](#)
- [4.5 Volunteers and Students](#)
- [4.6 Code of Conduct](#)
- [5.1 Interactions and Relationships with Children](#)
- [5.2 Positive Behaviour Support Practices](#)
- [6.7 Feedback and Complaints Handling](#)
- [6.11 Cultural Safety](#)
- [7.4 Leading Compliance and Quality Assurance](#)
- [7.6 Privacy and Confidentiality of Records](#)
- [7.7 Managing Notifications](#)
- [7.11 Child Care Subsidy \(CCS\) and Additional Child Care Subsidy \(ACCS\) Management and Compliance](#)
- [7.12 Workplace Health and Safety](#)
- [7.13 Service Closure](#)

Forms and Resources

[Responsible Persons Determination Checklist and Consent](#)

Policy 7.2 Determining the Responsible Person		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V2-03.2025 – Added additional information to AP roles and responsibilities and added NS roles and responsibilities, added procedure relevant to signage for multiple RPs.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced key tasks and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards.		
V4-04.2026 – enhanced roles and responsibilities, added procedures relevant to child protection training, National Child Safety Training, enhanced procedures relevant to record keeping and retention to include National Early Childhood Worker Register, added reference to National Law and Regulations.		

7.3 Educational Leader

Policy Statement

The Service acknowledges the need to establish a suitably qualified and experienced educator or service leader to be responsible for the development and implementation of the program. This role should enhance the practices of educators and be focused on building a collaborative approach to incorporate the ideas and suggestions of a wide range of stakeholders to inform the development of the program always with a foundational commitment to child safety, wellbeing, and cultural safety.

The service recognises the requirement to maintain records of the designated Educational Leader including documentation of their child protection and cultural safety training.

Roles and Responsibilities

Approved Provider	• Ensure the suitability of the Educational Leader has been documented and the Educational Leader's appointment has been agreed to in writing. This suitability assessment must include an evaluation of their commitment to and understanding of child safe practices. • Ensure the name of the Educational Leader is on display in a place where it is clearly visible to anyone from the main entrance of the service • Provide comprehensive and ongoing training and instruction to the Educational Leader to ensure they know and understand their role and responsibility with a particular focus on child protection, cultural safety, and trauma-informed practice.
Nominated Supervisor	• Put forward recommendations to the approved provider for a person or persons to fulfil the Educational Leader role prioritising candidates with a strong commitment to and knowledge of creating child safe environments. • Maintain the records for the designation of the Educational Leader. • Display the name of the Educational Leader of the ECS in a place where it is clearly visible to anyone from the main entrance of the service • Support the Educational Leader to develop and implement the service's program.
Educational Leader	• Agree to their appointment as the Educational Leader of the Service in writing. • Participate in all required training provided by the Approved Provider and relevant to their role and responsibility including mandatory child protection and cultural safety training. • Undertake their role collaboratively and with professionalism. • Lead the development of the service program, using the relevant Approved Learning Framework to inform and guide children's learning and development, and ensure that clear goals and expectations have been established. • Ensure that curriculum decision making is informed by the context, setting and cultural diversity of the families and the community. • Ensure the foundation for the program is based on the children's current knowledge, ideas, culture and interests and that it is delivered in a way that respects and promotes their safety and wellbeing. • Ensure each child's wellbeing, learning and development is assessed as part of an ongoing cycle of planning, documenting and evaluating with a particular focus on the child's safety, sense of belonging, and emotional security. • Ensure that critical reflection and evaluation of children's wellbeing, learning and development is used for planning and to improve the effectiveness of the program. • Champion and embed the Queensland Child Safe Standards into the service's educational philosophy and daily practice.

	• Actively promote a culture of cultural safety and inclusion, particularly for Aboriginal and Torres Strait Islander children, by ensuring the curriculum and environment are culturally responsive and respectful. • Mentor educators in the implementation of the program, providing professional support to assist with further skills and knowledge and provide opportunities for ongoing reflection and feedback on current practices including fostering a shared understanding of child protection responsibilities. • Ensure that families have opportunities and support to be involved in the program and service activities as well as contributing to the review of service policies and decisions especially those related to child safety and wellbeing.
All Staff	• Support the development and implementation of the service's program through completing their duties in the programming cycle - adding to the service's documentation and critical reflection to their capacity. This includes ensuring all curriculum decisions and activities are aligned with the service's child safety and wellbeing policies.

Procedures

Assessing Suitability

The Nominated Supervisor will coordinate with the Approved Provider to identify and assess a suitably qualified and experienced educator (or another suitable individual) to fulfil the role for the service. This assessment will include a review of the candidate's knowledge of and experience with implementing child protection and cultural safety frameworks.

The Nominated Supervisor will document their assessment of the person's suitability and retain this information in the appropriate records, including their employee file.

Educational Leader Appointment

Appointment to the Educational Leader position will be based on the suitability assessment conducted by the Nominated Supervisor.

The Approved Provider will ensure the designated Educational Leader has confirmed their role in writing. The written evidence will be maintained in the service records, including in the employee file (refer policy [7.6 Privacy and Confidentiality of Records](#)).

The Educational Leader must agree to participate in all required training with completion of the training documented and kept on the employee's staff records. This training will include child safe standards, cultural competence and trauma informed care.

Programming Cycle Responsibilities

The Educational Leader will be responsible for:

1. Leading the development of the Service program, using the My Time, Our Place: Framework for School Age Care in Australia to inform and guide children's learning and development, and ensure that clear goals and expectations have been established with a particular focus on embedding the principles of safety, wellbeing, and cultural responsiveness,
2. Ensure that curriculum decision making is informed by the context, setting and cultural diversity of the families and the community, while also ensuring that the environment and activities are free from harm,
3. Ensure that the foundation for the program is based on the children's current knowledge, ideas, culture and interests,
4. Ensure that each child's learning and development is assessed as part of an ongoing cycle of planning, documenting and evaluating with an emphasis on observing and responding to children's emotional and social wellbeing,

5. Ensure that critical reflection and evaluation of children's learning and development is used for planning and to improve the effectiveness of the program,
6. Mentor educators in the implementation of the program, providing professional support to assist with further skills and knowledge and provide opportunities for ongoing reflection and feedback on current practices including the effectiveness of child safety and cultural safety strategies,
7. Ensure that families have opportunities and support to be involved in the program and service activities as well as contributing to the review of service policies and decisions particularly those policies that directly impact child safety and wellbeing.

The Approved Provider and Nominated Supervisor will ensure rostering, and resources are adequate for the Educational Leader to fulfil their responsibilities. This includes providing sufficient time and resources for the Educational Leader to engage in professional development related to child protection, cultural safety and trauma informed care.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations:**
 - R.118 Educational Leader
 - R.148 Educational Leader
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.173 Prescribed information to be displayed - education and care service other than a family day care service
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety
 - QA3 – Physical environment
 - QA4 – Staffing arrangements
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and Leadership

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [1.1 Educational Program Development and Implementation](#)
- [1.2 Documenting Children's Learning](#)
- [1.3 Sharing the Program and Children's Progress with Families](#)
- [1.4 Excursions, Incursions and Regular Outings](#)
- [1.5 Sleep, Rest and Relaxation](#)
- [1.6 Food and Nutrition](#)
- [1.7 Screen-Time and Media Viewing](#)
- [6.5 Interactions and Communication with Families](#)
- [6.6 Community Communication and Participation](#)

Policy 7.3 Educational Leader		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V2-03.2025 – Added additional information to all roles and responsibilities, added procedure relevant to assessing suitability.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards.		
V3-04.2026 – No updates		

7.4 Leading Compliance and Quality Assurance

Policy Statement

The Approved Provider is committed to ensure every aspect of the Service's operations is compliant with all relevant legal obligations. This commitment extends beyond business and employment to a core focus on child safety, wellbeing and cultural safety, aligned with the Education and Care National Law and Regulations and Queensland Child Safe Standards.

The Approved Provider, assisted by Service management will develop sound procedures and systems to meet all statutory requirements and expectations. The Approved Provider is committed to ongoing quality improvement, routinely reviewing and assessing the efficiency of implemented actions to achieve compliance. All employees will be supported and encouraged to communicate issues or concerns about legal compliance to the Nominated Supervisor or representative of the Approved Provider for assessment, review and the potential development of practices or procedures that enhance child safety, wellbeing, and cultural responsiveness.

Any and all instances of non-compliance particularly those related to child safety, will be treated with the utmost seriousness. Review and evaluation to address issues will be a priority of the Approved Provider and the Service management team.

As an education and care service, the Service are committed to provide quality and legislative compliant education and care for our community. In doing so we recognise our obligation to meet statutory requirements outlined in the National Quality Standard and the requirements for Approved Providers and Nominated Supervisors under the *Education and Care Services National Law Act and Regulations*. The management and governance of the Service have been designed to best fulfil our responsibilities to educate and care for children in a safe, culturally respectful, and nurturing environment. The Service expects all personnel (including employees and representatives of the Approved Provider) to carry out the agreed policies and procedures of the service when discharging their duties.

The [Service Philosophy](#) reflects the commitment to quality education and care consistent with the National Quality Framework. The Philosophy reflects the values promoted by the Approved Provider and the Nominated Supervisor and underpins all elements of the Service operations, with a central focus on ensuring every child feels safe, supported, and culturally valued.

Roles and Responsibilities

Approved Provider	• Ensure policy and procedure and risk management frameworks are implemented with a strong emphasis on child safety, wellbeing, and cultural safety. • Lead a culture of quality service delivery and sound business practices. • Actively monitor service outcomes and practices to ensure the service is meeting obligations and expectations related to child safety and wellbeing and cultural safety. • Respond diligently to any concern or non-compliant issues, including relevant reporting especially those involving child safety, harm, or abuse.
Nominated Supervisor	• Support the supervision and monitoring of practices and the implementation of procedures to ensure compliance with a focus on creating a safe and culturally inclusive environment for children. • Regularly provide reports to the Approved Provider on the compliance and quality assurance of the service, including specific reporting on child safety and wellbeing indicators. • Immediately notify the Approved Provider of concern or instances of non-compliance, particularly any that may pose a risk to a child's safety or wellbeing. • Provide insight to opportunities for practice and policy development to support the outcomes and compliance of the service, with a focus on strengthening child safety measures and cultural responsiveness.

All Staff	• Ensure practices and conduct reflect the service policies, procedures and management instructions at all times with a commitment to the safety and wellbeing of all children. • Participate in quality improvement practices and reviews by contributing ideas and perspectives on opportunities for more robust systems and procedures to meet obligations and responsibilities, especially regarding child safety and wellbeing and cultural safety.

Procedures

Awareness of Obligations

The Approved Provider is committed to having a sound understanding of its legal obligations and will maintain an ongoing and contemporary understanding of the responsibilities of themselves and their employees. This includes staying abreast of changes to legislation and best practices related to child safety and protection.

The Approved Provider will collaboratively develop and implement policies and procedures to assist in meeting the organisation's legal obligation. These documents will aim to reflect and articulate the responsibilities of all employees, managers and volunteers of the organisation with clear, explicit instructions regarding the identification, reporting, and prevention of harm to children, as well as the promotion of their cultural safety.

Role and Composition of Sub Committee and/or Advisory Group

The Approved Provider is required to set out clearly defined guidelines for any sub committees or advisory groups established to support the effective operations of the Service. Whilst there are no obligations to operate with a sub-committee or advisory group, these procedures recognise the benefits that sub committees and advisory groups have to offer as active participants in decision making and policy review, particularly in relation to child safety, wellbeing, and cultural diversity.

The Sub Committee/advisory group has a written role statement and must abide by policy [4.6 Code of Conduct](#) which forms part of the participation requirements for involvement in these groups.

The guidelines for any sub-committee and/or group will clearly state:

- The purpose of the sub-committee and/or group (objectives for establishment), including specific objectives related to child safety, wellbeing, and cultural safety.
- The expectations of participation (including confidentiality and conduct), with particular focus on the importance of ethical conduct and a commitment to child-safe practices.
- The extent of authority or decision making (delegations),
- The duration of the sub-committee and/or group including when the purpose of the group will be reviewed/evaluated to ascertain whether the objectives for establishment are being achieved,
- The reporting obligations to the Approved Provider (including minutes and meeting reports),
- Any other matters deemed relevant to ensuring the group operates effectively, with a priority on child-focused outcomes.

The Service regularly publicises details of the role, operation and composition of the Sub Committee or advisory group and the right of parents/guardians and community members to nominate for appointment, encouraging nominations from diverse cultural backgrounds to ensure a culturally safe environment.

Commitment to Quality Systems and Practices

All developed and implemented procedures and practices should reflect the high-quality expected by the Approved Provider with a primary focus on the safety, wellbeing, and cultural responsiveness of children.

The Approved Provider, Nominated Supervisor and all other relevant stakeholders will be supported to collaborate on sound procedures and practices to uphold a commitment to compliant and high-quality practices which includes a robust framework for implementing child safe practices.

Responding to Non-Compliance

Any instances of non-compliance especially those that impact a child's safety or wellbeing, will be addressed with timeliness, ethical integrity and diligence.

In the event of a non-compliant or reportable incident, the Approved Provider will provide all relevant notifications to specific authorities, as it applies including immediate reporting to the appropriate child protection agencies as required by law.

In responding to compliance incidents and concerns the Approved Provider will take a sound approach to review evidence and resources to address any applicable procedures, practices and expectations, with a priority on rectifying any gaps that may compromise child safety.

Establishing Compliance

The Service will have policies and procedures that have been developed to be consistent with the requirement of the provision of the National Quality Framework, with all policies underpinned by a commitment to child safety, wellbeing, and cultural safety.

The Service will regularly review and update written policies for the conduct of the service to reflect best practice and legislative requirements (refer policy [7.8 Policy Development, Review and Implementation](#)) with a continuous focus on aligning with the child safe standards and practices.

The Service has developed and managed the implementation of policies required by the *Education and Care Services National Regulation 168* and items outlined in the *National Quality Standard* and has management systems in place to ensure these policies are followed.

Day-to-Day Compliance

The Approved Provider will appoint a suitable and qualified Nominated Supervisor for the day-to-day management of the service's operations (refer policy [7.1 Nominated Supervisor](#)) who will act as the primary leader for child safety and wellbeing.

The Nominated Supervisor to be responsible for day to day compliance of the NQF through:

- Monitoring establishing systems and processes to ensure compliance with the NQF, including daily checks of child safety protocols.
- Providing ongoing training to all the Service employees on compliance with the NQF, with a specific focus on child protection, mandatory reporting, and culturally safe practices.
- Monitoring, recording, and acting on non-compliance by the Service or its employees, particularly any breaches that could affect a child's safety.

The Nominated Supervisor is to report on all NQF compliance matters to the Approved Provider and maintain up-to-date knowledge of the *Education and Care Services National Law, Regulations* and the National Quality Standard which may affect or require an update to any of the policies and procedures of the Service including legislative changes related to child protection and the Queensland Child Safe Standards.

Consultation and Collaboration

The Nominated Supervisor and Approved Provider will ensure that all educators within the service are:

- Consulted as appropriate in the development and modification of all relevant policies and procedures, including those related to child safety and cultural diversity.
- Provided with an up-to-date Educator Handbook containing relevant information to support and guide their understanding of the service's policies and procedures; and
- Provided with suitable instruction to their obligations in ensuring compliance with Education and Care Legislation on employment (refer policy [4.1 Recruitment and Employment of Educators](#)) which includes rigorous screening and child-safe hiring practices.

Professional Support and Supervision

The Nominated Supervisor in conjunction with the Approved Provider is responsible for regular supervision and support of educators (refer policy [4.7 Employee Development and Performance Review](#)) with supervision activities designed to mentor and support educators in upholding child safety standards.

Access to Legislation

A copy of the *Education and Care Services National Law* and *National Regulations* will be made accessible at the Service premises at all times for use by the Approved Provider, Nominated Supervisor, staff members, volunteers and parents/guardians of children at the service along with the Queensland Child Safe Standards and relevant child protection resources.

Compliance Monitoring

Compliance monitoring strategies will be implemented, including:

- Developing compliance management tools for use within the service on a regular basis (i.e. checklists and standards), specifically including checklists to assess child safety and wellbeing.
- Policy guidance and/or instruction provided to ensure employees and volunteers meet the service's obligations where there are expectations and responsibilities for legislative compliance, with a focus on mandatory reporting and child protection.
- Training and instruction provided to all employees and volunteers to outline appropriate expectations of conduct and statutory responsibilities, including mandatory training on child safe practices and cultural safety.
- Monitoring the implementation and compliance of the organisation's policies and compliance systems, with a strong emphasis on continuous improvement of child safety protocols.
- Reviewing and updating compliance checklists on a regular basis or as new information regarding changes to the implementation of regulations, legislation or standards becomes available, especially those related to child protection laws.
- Seeking reputable organisations to conduct external audits and to provide reports regarding compliance issues to the service on a regular basis, with the explicit purpose of assessing the service's child safety and wellbeing frameworks.
- Acting on any relevant recommendations or notification to changes in compliance requirements immediately.

Information will be made accessible to families, volunteers and employees regarding the service policies and procedures in relevant handbooks as well as having access to a full copy of the service policies and procedures at the Service. This will include clear, concise information on the service's commitment to child safety and how families can report concerns.

Updates, changes and other relevant information will be communicated to families, volunteers and employees through appropriate newsletters, flyers and other methods of communication, including information on child safety initiatives and changes to child protection policies.

Remedying Compliance Concerns

The Service will take immediate action to remedy any non-compliance and policy/procedure breaches identified through:

- Internal compliance monitoring activities, especially those that uncover a risk to children.
- External compliance monitoring activities such as:
 - Spot checks undertaken by the Regulatory Authority
 - External audits

The Service takes the obligation for operational compliance very seriously. Relevant management action will be taken to address any identified concerns. Where required additional external support will be sourced. Alternatively relevant actions will be set out in the Quality Improvement Plan (QIP), with reporting to be directed back to the Approved Provider in a timely manner.

Compliance History Record

In accordance with Regulation 167, the Service will keep a record of its compliance history and make it accessible upon request. The history must include:

- Details of any amendment of the service approval made by the Regulatory Authority under section 55 of the Law,
- Details of any suspension of the service approval (other than voluntary suspension), and
- Details of any compliance direction or compliance notice issued to the approved provider in respect of the service.

The information in the Service compliance record must not include any information that identifies any person other than the Approved Provider.

Policy and Procedure Breaches

Any action undertaken by employees, volunteers and management that is inconsistent with the Service policy and procedures will be considered a breach. This is especially critical for breaches that compromise child safety, wellbeing, or cultural safety.

Action taken to remedy breaches may include:

- Reviewing the policy and procedure and updating as required to close any loopholes that allowed the breach to occur,
- Retraining in the policy and procedure, with a focus on the importance of child-safe practices.
- Undertaking performance management procedures, including disciplinary action for any breaches that endanger children.

Policy and procedure breaches resulting in non-compliance with the law will be reported in accordance with policy [7.7 Managing Notifications](#).

Positive Notice Blue Card Compliance and Breach Action

As per procedures detailed in policy [4.3 Working with Children Checks and Management](#), all employees (Paid or Exemption), volunteers (V) and executive members of Approved Provider must hold a current and valid Working with Children Check – Blue Card.

A blue card register will be maintained at the Service containing copies of blue cards of all employees, volunteers and executive members of management. Any breaches to these obligations will be reported to the Approved Provider and immediate action taken to remedy the breach, including removing the individual from any contact with children until the matter is resolved.

Other Legislative Compliance

In addition to compliance with the *Education and Care Services National Law, 2010 and Regulations 2011*, The Service will actively work towards compliance with:

- Family Assistance Law (Child Care Subsidy),
- Working with Children (Risk Management and Screening) Act 2000 and Regulations 2011,
- Child protection and workplace safety legislation,
- Employment Legislation, including:
 - Industrial Relations Act (Qld) 2016,
 - Workplace health and safety legislation and relevant codes of practice, and
 - Anti-discrimination legislation,
- Any other law(s) that impacts or prescribes how the provision of OSHC should be conducted.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations**
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety
 - QA3 – Physical environment
 - QA4 – Staffing arrangements

- QA5 – Relationships with children
- QA6 – Collaborative partnerships with families and communities
- QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [A New Tax System \(Family Assistance Administration\) Act 1999](#)
- [Anti-Discrimination Act 1991 \(Qld\)](#)
- [Building Fire Safety Regulation 2008 \(Qld\)](#)
- [Child Protection Act 1999 \(Qld\)](#)
- [Disability Discrimination Act 1992](#)
- [Electrical Safety Act 2002 \(Qld\)](#)
- [Industrial Relations Act 2016 \(Qld\)](#)
- [Fire and Emergency Service Act 1990 \(Qld\)](#)
- [Food Act 2006 \(Qld\)](#)
- [Health \(Drugs and Poisons\) Regulation 1996 \(Qld\)](#)
- [Industrial Relations Act 2016 \(Qld\)](#)
- [Privacy Act 1988 \(Cth\)](#)
- [Public Health \(Medicinal Cannabis\) Act 2016 \(Qld\)](#)
- [Public Health Act 2005 \(Qld\)](#)
- [Queensland Education \(General Provisions\) Act 2006 \(Qld\)](#)
- [Racial Discrimination Act 1975](#)
- [Sex Discrimination Act 1984](#)
- [Transport Operations \(Road Use Management—Road Rules\) Regulation 2009](#)
- [Work Health Safety Act and Regulations 2011 \(Qld\)](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [1.1 Educational Program Development and Implementation](#)
- [1.2 Documenting Children's Learning](#)
- [1.4 Excursions, Incursions and Regular Outings](#)
- [1.5 Sleep, Rest and Relaxation](#)
- [1.6 Food and Nutrition](#)
- [2.1 Providing a Child Safe Environment](#)
- [2.2 Supervision and Educator Ratios](#)
- [2.3 Safe Arrivals and Departures of Children](#)
- [2.4 Incident, Injury, Trauma and Illness](#)
- [2.5 Administration of First Aid](#)
- [2.6 Water Safety](#)
- [2.7 Infectious Diseases](#)
- [2.8 Hygiene, Health and Wellbeing Practices](#)
- [2.9 Medical Conditions in Children](#)
- [2.10 Administration of Medication](#)
- [2.11 Sun Safety](#)
- [2.12 Safe Food Handling, Preparation and Storage \(Food Safety Program\)](#)
- [2.13 Emergency Evacuation, Lockdown and Drills](#)
- [2.14 Child Protection and Mandatory Reporting](#)
- [3.3 Smoking, Drugs and Alcohol-free Environment](#)
- [3.4 Children's Toileting](#)
- [3.5 Emergency and Safety Equipment](#)
- [4.1 Recruitment and Employment of Educators](#)
- [4.3 Working with Children Checks and Management](#)
- [4.5 Volunteers and Students](#)
- [4.6 Code of Conduct](#)
- [4.7 Employee Development and Performance Review](#)
- [4.8 Employee Qualifications – Monitoring Progress](#)
- [4.9 Fitness for Work](#)

[4.10 Managing Employee Underperformance and Misconduct](#)

[4.11 Prevention of Workplace Bullying, Discrimination and Harassment including Sexual Harassment](#)

[5.1 Interactions and Relationships with Children](#)

[5.2 Positive Behaviour Support Practices](#)

[6.1 Access for Families](#)

[6.2 Enrolment and Orientation](#)

[6.3 Bookings and Cancellations](#)

[6.4 Acceptance and Refusal of Authorisations](#)

[6.5 Interactions and Communication with Families](#)

[6.7 Feedback and Complaints Handling](#)

[6.8 Visitors](#)

[7.1 Nominated Supervisor](#)

[7.2 Determining the Responsible Person](#)

[7.3 Educational Leader](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.6 Privacy and Confidentiality of Records](#)

[7.7 Managing Notifications](#)

[7.8 Policy Development, Review and Implementation](#)

[7.9 Budgeting, Procurement and Financial Planning](#)

[7.11 Child Care Subsidy \(CCS\) and Additional Child Care Subsidy \(ACCS\) Management and Compliance](#)

[7.12 Workplace Health and Safety](#)

[7.13 Service Closure](#)

[7.15 Self-Assessment and Quality Improvement](#)

Policy 7.4 Leading Compliance and Quality Assurance		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V2-03.2025 – Added additional information to AP and NS roles and responsibilities, added procedure relevant to subcommittee/advisory group.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards.		
V3-04.2026 – No updates		

7.5 Governance and Management

Policy Statement

The Approved Provider is responsible to ensure that appropriate governance arrangements are in place to guide service decision making ensuring effective oversight for those with management and control of the Service. This responsibility is primarily focused on safeguarding children's safety and wellbeing, creating a culturally safe environment, and ensuring compliance with regulatory requirements.

Persons with Management and Control

Guided by regulatory requirements, any persons appointed to relevant leadership and governance responsibilities must be able to demonstrate they are fit and proper people, including—

- Holding relevant working with children checks,
- Demonstrating management capability, particularly in areas related to child safety, wellbeing, and cultural responsiveness.
- Providing evidence of a clear criminal history (e.g., a national police check).

Persons with management and control will be guided by the organisation's constitution and relevant legislation, with a specific focus on the principles of child safety, when discharging responsibilities.

Roles and Responsibilities

Approved Provider	• Ensure relevant suitability and management capability checks are undertaken and reported placing paramount importance on a person's suitability to work with children. • Provide quality management practices to support and guide the service's employees and leadership with a clear mandate to embed a culture of child safety. • Ensure quality and risk management practices are sound to uphold the principles of protecting children from harm and ensuring their physical and psychological safety. • Ensure staff Employment Agreements are complied with, consistent with relevant pay award, correct tax is deducted, and safe working conditions are provided, which includes safeguarding against child abuse and neglect. • Fulfil reporting and notifying obligations including mandatory reporting of child harm or risk. • Ensure there is an appointed Nominated Supervisor for the Service • In the absence of the Nominated Supervisor, ensure there is a suitably delegated Responsible Person, who understands and prioritises child safety protocols, responsible for managing and controlling the day-to-day functions of the service.
Nominated Supervisor	• On behalf of the Approved Provider: • Develop and implement policies, procedures and practices to be reflective of the intent of the relevant legislations with a strong emphasis on child safe practices • Develop and implement systems and management processes to monitor the practices and performance of all staff and educators specifically for their adherence to child protection and cultural safety policies. • Ensure all legislative requirements are met to maintain service approval and CCS approval • Use a third party software program to interact with the CCS System and the use of electronic attendance records • Develop and maintain the service's Quality Improvement Plan through self-assessment in collaboration with educators, staff, families, children

	and community ensuring that children's voices and perspectives are central to the QIP.

Key Tasks and Responsibilities

Governance Decisions	The executive committee of the Approved Provider will discharge the responsibilities of the Association in relevant management decision-making with a primary focus on decisions that impact the safety and wellbeing of children. In the case of an individual or incorporated association governance structure this will be worded differently to reflect the governing rules of the association for persons with management and control.
Day-to-day leadership	The Nominated Supervisor, or in their absence, the Responsible Person, will be responsible for managing and controlling the day-to-day functions of the service and report relevant information to the Approved Provider. However, it should be noted that the day-to-day leadership functions of the Responsible Person do not assume to full level of responsibilities and duties held by the Nominated Supervisor as would be articulated in the position description defining that role. Both the Nominated Supervisor and Responsible Person are accountable for upholding child safety standards.

Procedures

Child Safe Entity

The Service is committed to the safety, wellbeing, and empowerment of all children in our care. Our governance frameworks are built upon a foundation of zero tolerance for child abuse and neglect, and a proactive dedication to fostering a child safe environment in accordance with the National Principles for Child Safe Organisations and the Queensland Child Safe Standards and Universal Principle.

Our Approved Provider, Nominated Supervisor, Educators and volunteers are collectively responsible for upholding this commitment. We believe that robust governance is essential to creating and sustaining a culture where:

- Child Safety is embedded in leadership and governance,
- Children are informed, participate, and are taken seriously,
- Families and communities are informed and involved,
- Equity is upheld and diverse needs are respected,
- People working with children are suitable and supported,
- Processes to respond to complaints and concerns are child-focused,
- Physical and online environments promote safety and wellbeing, and
- Implementation of the child safe standards is regularly reviewed and improved.

Governance

Fit and Proper Persons

When electing individuals for responsibilities of management and control of the Approved Provider, the members of the association will consider the fitness and propriety of nominated individuals, as they will need to demonstrate these characteristics to the Regulatory Authority to hold Provider Approval.

Management capability includes (but is not limited to) the individuals' qualifications, knowledge, skills and experience in the areas of:

- Governance, with an understanding of child-focused governance models
- Employment, including robust recruitment and screening for child safety.
- Quality assurance and compliance, with a focus on the various child protection requirements.
- Risk management, specifically regarding risks to children's safety.

Decision-Making

The Approved Provider will ensure decision making is consistent with the organisation's governance framework and the organisation's constitution which sets out broader principles of how the organisation is managed and controlled.

The individuals with management and control of the Approved Provider will ensure that decision making is informed by and consistent with the requirements articulated in the relevant laws and provisions, including (but not limited to):

- The P&C Association Constitution,
- The P&C Accounting Manual,
- Education and Care Services National Law and Regulations, with a specific emphasis on child safety and wellbeing.
- Family Assistance Law.

Sustainable Operations and Handover

Relevant documentation and plans are created to set out and describe key systems of work to support both the efficient operations of the Service and effective handover of people with management and control. These plans and structures ensure that there is minimal impact when there are changes in the executive committee, especially concerning the continuity of child safety practices.

Strategic Planning

Approved Provider will develop and maintain a strategic plan for the Service to ensure consistent and ongoing financial viability can be maintained. In collaboration with the Nominated Supervisor, strategic planning sessions with the Approved Provider will include opportunity to review current service operations and take a planned strengths based approach to the future of the OSHC business through SWOT analysis and quality improvement planning, with a core objective of continually enhancing child safety and cultural safety.

High quality and effective services are delivered through effective quality improvement planning. Service plans are developed and evaluated on a regular basis and communicated to all stakeholders with a focus on how these plans contribute to a child-safe environment.

Confidentiality

All executive members of the Approved Provider along with the Nominated Supervisor, Educational leader and educators who have access to confidential information, whether in the course of their work or otherwise, shall not disclose information to anyone unless the disclosure of such information is required by law and will respect the confidentiality of all documents and meetings that occur. This includes protecting the identity of children and families, except in cases where information must be disclosed for child protection purposes. This also includes:

- using information acquired for their personal or financial benefit, or for the benefit of any other person,
- permitting any unauthorised person to inspect or have access to any confidential documents or other information,
- any information received or transmitted via mobile telephone (including text/SMS) or any other electronic device (e.g. email) shall be treated with the same confidentiality as any other written form of communication and must be stored confidentially.

This obligation, placed on an executive member of the Approved Provider, Nominated Supervisor, Educational leader and educators shall continue even after the individual has completed their term and is no longer on the executive committee or employed by Approved Provider.

The obligation to maintain confidentiality also applies to any person who is invited to any meetings of the Approved Provider.

Policy Framework

The objective of Approved Provider is to pursue and achieve quality outcomes for children and meet the requirements of the relevant legislation through up to date policies and procedures. The Service suite of policies and procedures has been developed to protect the organisation, management, staff, educators, families, and, most importantly, children and will be regularly reviewed to ensure the most updated written policies and procedures regarding the operation of the service are available.

The Nominated Supervisor is responsible for scheduling a review of all policies on a regular basis or as required to identify emergent needs and any changes required to improve service delivery. Changes in the Education and Care Services National Regulations (2011) and National Quality Standard that may require a change to any of the Policies and Procedures of the service will be monitored and any changes to policies and procedures identified and implemented with particular attention paid to child protection and cultural safety updates.

All stakeholders views are actively sought in the development of policies, ensuring that all families, educators and Service staff receive information about any new policies or changes to policies which may impact upon them. Any outcomes will be fully explained and changes to policies will be communicated prior to their implementation. This includes ensuring families from diverse cultural backgrounds have the opportunity to contribute to culturally safe practices.

Child Care Subsidy

As an approved education and care service, the Approved Provider has responsibilities in accordance with the Family Assistance Law for the administration of child care subsidy for eligible families. Details of these requirements are set out in policies [7.11 Child Care Subsidy \(CCS\) and Additional Child Care subsidy \(ACCS Management and Compliance\)](#) and [7.16 CCS Governance](#).

Staffing and Recruitment

The executive committee members of the Approved Provider will oversee and ensure the recruitment of qualified personnel in accordance with policy [4.1 Recruitment and Employment of Educators](#), prioritising a thorough, child-safe recruitment process.

The Nominated Supervisor will undertake regular performance reviews (refer policy [4.7 Employee Development and Performance Review](#)) to ensure staff practice is in accordance with the legislation, the National Quality Standard and the service's policies and procedures are being met with performance indicators reflective of child safety and wellbeing practices.

The Approved Provider will ensure the Nominated Supervisor, Responsible Persons, educators, students, volunteers and any other staff working with children have successfully completed an approved child protection training course to satisfy compliance with s162A of the Education and Care Services National Law Act.

The Approved Provider will ensure all executive members of the Approved Provider, Nominated Supervisor, Responsible Persons, educators, students, volunteers and any other staff working with children have successfully completed the foundation National Child Safety Training modules within 14 days of commencement or before working directly with children (whichever is shorter). Executive members of the Approved Provider and Nominated Supervisors must also complete the advanced modules of the National Child Safety Training. All persons must complete child safety refresher training every two years.

The Approved Provider will ensure all worker information is recorded in the National Early Childhood Worker Register within 14 days of commencement in their position or when made aware of any change of worker information.

Asset Management

The Service will maintain an asset register to meet the requirements of auditing and insurance and for the benefit of future planning. The register will be maintained by the Nominated Supervisor and include categories such as:

- Furniture,
- ICT Equipment,
- Outdoor/sporting Equipment,
- Kitchen/cooking Equipment; and
- Child-related resources (other than consumables) with specific notes on their safety and age-appropriateness.

To support the accuracy of the register, a review and inspection of assets listed on the register will be undertaken at least every six months and will include notes of any issues identified and/or disposal of the

asset. Stocktakes of consumable items owned by the Service such as food or arts and crafts materials will be conducted as required but no less than annually for audit purposes.

Items may be disposed of when they are damaged, aged or unsuitable for their purpose especially if they pose a safety risk to children. In the event that items are in need of disposal, the Nominated Supervisor will reflect this outcome in the asset register and record the reasons for the disposal. Any asset being disposed of with a value greater than \$500 will be included in either direct communication or formal reporting, such as the financial report or Nominated Supervisor report to the Approved Provider.

Risk Management

Financial Risk Management

Financial risk management involves assessing the financial risks facing an organization and developing management strategies consistent with organisational priorities and policies. Addressing financial risks proactively ensures that management, operational staff, stakeholders, and executive members of the Approved Provider are in agreement on key issues of risk. This includes ensuring sufficient funds are allocated to training and resources that support child safety.

The executive committee members will ensure the Service has:

- An approved budget for the year and that expenditure is within the budget.
- Processes in place to ensure there is sufficient income to meet the budget requirements.
- An audit completed every year to ensure the funds are properly accounted for.
- An audited financial statement presented each year at the organisation's AGM.

In relation to the financial management of the Service the following documents will be developed and maintained:

- A sound Business Plan that outlines the organisations plans for viability and growth
- An effective Budget that details the expected revenue the expenses including allocation of funds to training specifically for Educational Leaders, educators and administrative staff pertaining to their role and responsibilities for child safety and wellbeing.

There are processes in place to ensure:

- The submission of Child Care Subsidy data has been reviewed for accuracy, any identified anomalies are checked and verified for accuracy.
- Child Care Subsidy and parent gap fee payments are received, receipted and accounted by the service utilising sound back-up systems for accounting of parent gap fees and Child Care Subsidy to protect accuracy, credibility and storage.
- Reporting child absences in accordance with Family Assistance Legislation.

Safety Risk Management

The Approved Provider and Nominated Supervisor will take all practical steps to ensure there is a robust and effective approach to identifying hazards, assessing the risks and applying controls to ensure the risk of harm to children and adults is mitigated where possible. This includes ascertaining and eliminating or minimising all realistically foreseeable hazards and providing suitable training and instruction for employees and educators to ensure they have knowledge and understanding of health and safety risks.

The Service has an established risk assessment framework to support Educators with a variety of health and safety risks evident within the service environment and program. Risk management procedures include daily safety checklists completed prior to children accessing areas with a particular focus on identifying and removing any potential dangers to children.

Insurance

The Education and Care Services National Regulation requires Education and Care Services to have public liability insurance for the protection of staff, Educators, parents, children and others. Approved Provider recognises that insurance is a way of managing risks and ensuring if an accident occurs there are protections in place for all involved.

Approved Provider will purchase and maintain a current Public Liability Insurance for the Service for a minimum of \$10 million dollars and other relevant insurances for contents. Insurance will be purchased through a reputable broker or agent.

All insurance policies relating to the operation of Service and staffing will be kept on file at the Service. The Approved Provider in conjunction with the Nominated Supervisor is responsible for ensuring that there is adequate Work Cover Insurance for all employees and including volunteers.

In the event of a claim being made by the Service, the Nominated Supervisor will immediately notify an executive member of the Approved Provider who will notify the Insurance Company, ensuring that all directions of the Insurance Company are followed and in the case of material or significant claims, seeks legal advice on behalf of the service.

Day-to-Day Management and Leadership

Structure

The Service has structured its staffing arrangements to ensure an organised, systematic, and effective approach to daily management. While the Nominated Supervisor is the person principally responsible for the day-to-day management and organisation of the service, they are supported by a leadership team, including Educational Leader and Responsible Persons to supervise and coordinate relevant sessions of care. All members of this team are committed to a shared responsibility for child safety.

Responsibilities

Broadly the Nominated Supervisor is responsible for—

Staffing and Supervision	• Develop and implement rosters to always ensure appropriate staff-to-child ratios and adequate supervision to keep children safe. • Conduct daily staff briefings to communicate the day's agenda, any special requirements, and to address queries or concerns including reviewing any specific child safety considerations for the day. • Encourage and facilitate ongoing professional development for staff to enhance their skills and knowledge especially in child protection, cultural safety, and trauma-informed practices. • Review and update staff training needs, ensuring adherence to current best practices.
Maintaining a Safe Environment	• Ensure daily safety checks of indoor and outdoor areas are carried out, ensuring spaces are safe and prepared for children. • Ensure cleanliness and hygiene through a consistent cleaning schedule. • Ensure all staff are trained and proficient in executing emergency procedures and other key procedures.
Child Arrival and Departure	• Ensure procedures are followed for children's arrivals and departures, keeping accurate attendance records. • Verify authorisation and identity of individuals collecting children and respond to any concerns about a child's safety at drop-off or pick-up.
Communication and Collaboration	• Establish clear and consistent communication channels with families, keeping them informed about their child's participation, behaviour and any relevant service updates. • Engage with staff, acknowledging their input, and providing support as needed.
Administration	• Oversee administrative tasks including enrolment management, record-keeping, and regulatory documentation with a focus on maintaining confidential child records securely. • Manage financial operations including fee collection, budgeting, and resource allocation.
Continuous Improvement	• Regularly assess and evaluate the service's practices and programs, identifying areas for improvement.

	Implement strategies for continuous improvement, incorporating feedback from staff and families, especially regarding child safety and cultural inclusivity.
Reporting	- Notify the Approved Provider of relevant information and circumstances including any child safety incidents. - Where needed, report relevant information to the Regulatory Authority on behalf the service including mandatory reports of harm or risk of harm to a child.

Accountability

The Approved Provider will monitor the Nominated Supervisor's performance in managing the OSHC service's functions. Should there be concerns regarding the operations and leadership of the Service, especially those impacting child safety, the Approved Provider will take relevant action to address these.

The Approved Provider will ensure sound financial management is maintained to avoid risks associated with insolvency and is committed to upholding ethical business practices and will cooperate with funding bodies to ensure compliance is maintained.

Managing Conflicts of Interest

Conflict of interest, whether actual, potential or perceived, must be declared by all executive committee members of the Approved Provider and/or Nominated Supervisor and managed effectively to ensure integrity. This is critical to ensuring all decisions are made in the best interests of the children.

Every stakeholder that is in a position of management has a responsibility to ensure their transactions, external business interests and relationships will not cause potential conflicts and to make such disclosures in a timely manner as they arise. The following process will be followed to manage any conflicts of interest:

- Whenever there is a conflict of interest, the person concerned must notify the Approved Provider about the conflict.
- The person with a conflict of interest must not be present during any meeting of the Approved Provider where the matter is being discussed or participate in any decisions made on that matter. The person concerned must provide the Approved Provider with any and all relevant information they possess on the particular matter.
- The minutes of the meeting must reflect that the conflict of interest was disclosed, and appropriate processes followed to manage the conflict.

All persons engaged (whether employed or voluntary) with the Service will be required to disclose any conflicts of interest in writing to ensure any associated risks can be considered and an informed decision made relevant to the individual circumstance of the conflict of interest.

Professional Support

The Approved Provider will seek relevant opportunities to be supported in the management role, including maintaining membership with peak body and employer organisations which can provide resources and training on child safety and wellbeing.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- Education and Care Services National Law:**
 - s.161 Offence to operate education and care service without nominated supervisor
 - s.161A Offence for nominated supervisor not to meet prescribed minimum requirements
 - s.162A Child Protection Training
 - s.162B Child Safety training
 - s.174 Offence to fail to notify certain information to Regulatory Authority
 - s.175 Offence relating to requirement to keep enrolment and other documents
- Education and Care Services National Regulations:**
 - R.128B Child protection training

- R.128D Foundation child safety training
- R.128E Advanced child safety training
- R.154A National Early Childhood Worker Register
- R.168 Education and care service must have policies and procedures
- R.170 Policies and procedures to be followed
- R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Education \(General Provisions\) Act 2006 \(Qld\)](#)
- [A New Tax System \(Family Assistance Administration\) Act 1999](#)
- [P&C Constitution](#)
- [National Principles for Child Safe Organisations](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [1.1 Educational Program Development and Implementation](#)
- [1.4 Excursions, Incursions and Regular Outings](#)
- [1.5 Sleep, Rest and Relaxation](#)
- [1.6 Food and Nutrition](#)
- [2.1 Providing a Child Safe Environment](#)
- [2.2 Supervision and Educator Ratios](#)
- [2.3 Safe Arrivals and Departures of Children](#)
- [2.4 Incident, Injury, Trauma and Illness](#)
- [2.5 Administration of First Aid](#)
- [2.6 Water Safety](#)
- [2.7 Infectious Diseases](#)
- [2.8 Hygiene, Health and Wellbeing Practices](#)
- [3.3 Smoking, Drugs and Alcohol-free Environment](#)
- [2.9 Medical Conditions in Children](#)
- [2.10 Administration of Medication](#)
- [2.11 Sun Safety](#)
- [2.12 Safe Food Handling, Preparation and Storage \(Food Safety Program\)](#)
- [2.13 Emergency Evacuation, Lockdown and Drills](#)
- [2.14 Child Protection and Mandatory Reporting](#)
- [3.4 Children's Toileting](#)
- [3.5 Emergency and Safety Equipment](#)
- [4.1 Recruitment and Employment of Educators](#)
- [4.3 Working with Children Checks and Management](#)
- [4.5 Volunteers and Students](#)
- [4.6 Code of Conduct](#)
- [4.7 Employee Development and Performance Review](#)
- [4.8 Employee Qualifications – Monitoring Progress](#)
- [4.9 Fitness for Work](#)
- [4.10 Managing Employee Underperformance and Misconduct](#)
- [4.11 Prevention of Workplace Bullying, Discrimination and Harassment including Sexual Harassment](#)
- [5.1 Interactions and Relationships with Children](#)
- [5.2 Positive Behaviour Support Practices](#)
- [6.1 Access for Families](#)
- [6.2 Enrolment and Orientation](#)
- [6.3 Bookings and Cancellations](#)
- [6.4 Acceptance and Refusal of Authorisations](#)
- [6.5 Interactions and Communication with Families](#)
- [6.7 Feedback and Complaints Handling](#)
- [6.8 Visitors](#)
- [7.1 Nominated Supervisor](#)
- [7.2 Determining the Responsible Person](#)

[7.3 Educational Leader](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.6 Privacy and Confidentiality of Records](#)

[7.7 Managing Notifications](#)

[7.8 Policy Development, Review and Implementation](#)

[7.9 Budgeting, Procurement and Financial Planning](#)

[7.11 Child Care Subsidy \(CCS\) and Additional Child Care Subsidy \(ACCS\) Management and Compliance](#)

[7.12 Workplace Health and Safety](#)

[7.13 Service Closure](#)

Policy 7.5 Governance and Management		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V2-03.2025 – Added additional information to AP role and responsibilities and added NS role and responsibilities, added procedures relevant to Governance of strategic planning, confidentiality, policy framework, financial risk management, safety risk management, insurance, asset management, staffing and recruitment and Managing Conflicts of Interest. Incorporated previous policy 7.12 Insurance.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced key tasks and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards.		
V4-04.2026 – added procedures relevant to Child Care Entity and Child Care Subsidy, National Child Safety Training and National Early Childhood Worker Register, added reference to National Law and Regulations.		

7.6 Privacy and Confidentiality of Records

Policy Statement

In providing education and care, Approved Provider collects, uses and stores personal and sensitive information relating to families, children, staff and others. The Service respects the privacy of all individuals and only obtains information it needs to protect and care for children, handle that information with confidentiality and sensitivity and uphold a commitment to all legal requirements.

The Service respects and supports the principles of privacy and confidentiality and complies with the Australian Privacy Principles in relation to information gathered and stored by the Service. The Approved Provider recognises their duty to ensure information collected by the Service is not shared beyond the legislated provision, including:

- to the extent necessary for the medical treatment of a child,
- with the parent/guardian of the child,
- with the Regulatory Authority or an authorised officer,
- where authorised or permitted by law, especially in cases of child protection concerns, or
- with written consent with the person providing the information, noting that consent must be informed and voluntary.

Roles and Responsibilities

Approved Provider	• Provide storage systems that ensure records are not accessible or visible by unauthorised persons. • Ensure adequate controls are established and discharging responsibilities for maintaining security of these storage systems. • Ensure every enrolling parent/guardian is provided with clear information about what personal information is kept and why and any legal authority to collect personal information. • Ensure staff are instructed on their role and responsibility in maintaining confidential and private information with a particular focus on how this protects children from harm. • Ensure there are suitable facilities and practices maintained by the service to uphold the commitment of privacy and confidentiality including verbal confidentiality in staff discussions. • Delegate the Nominated Supervisor to manage the retention schedule and collating of documents for archiving.
Nominated Supervisor	• Monitor, maintain and store all required records securely and for the appropriated timeframes in accordance with regulatory requirements • Manage and maintain records for Child Care Subsidy (CCS) and Additional Child Care Subsidy (ACCS). • Ensure documentation is kept in a manner that upholds the privacy and confidentiality of children and families especially sensitive information related to cultural background or family circumstances. • Ensure accurate and confidential processing of children's attendance records and information • Ensure any photographs of children are used appropriately and are respectful of family's cultural preferences and requests for their child's photograph not to be taken or used. • Obtain signed consent and authority prior to publishing photos or children's work, including the use of photos by a student on a placement • Maintain records to assist in the delivery of quality care and education. • Support the Approved Provider's obligation to maintain compliance with regulations including mandatory reporting and information-sharing obligations under child protection laws.

	• Approve the copying or removal of any records or files. Any removed records or files must be returned within 48 hours, logged into the Retention of Records Register and destroyed or replaced in the file • Maintain and store documentation in a manner that keeps records safe • Develop procedures to assist staff and educators to understand their obligations with regards to record-keeping, management, and secure storage of records with a focus on their role in protecting children's privacy and dignity.
Families	• Update their enrolment details annually, or whenever they experience a change in circumstances. Service records will be updated as soon as new information is provided. • Ensure documentation/authorisations are completed and signed in accordance with policies 6.2 Enrolment and Orientation and 6.4 Acceptance and Refusal of Authorisations. • If applicable, commit to not sharing any passwords provided or needed for you to sign your child in or out of care on the attendance register.

Key Tasks and Responsibilities

Maintaining records and ensuring security	The Nominated Supervisor will act on behalf of the Approved Provider in maintaining the records and systems that retain information on behalf of the service. The Approved Provider is responsible for ensuring adequate controls are established and discharging responsibilities for maintaining security of these systems, recognising that secure information management is a key component of child safety.
Archiving and Document Retention	The Nominated Supervisor will act on behalf of the Approved Provider managing the retention schedule and collating documents for archiving.
Maintaining privacy and confidentiality	All staff are responsible for ensuring information they have privilege to access is maintained and handled appropriately. The Approved Provider is responsible for establishing relevant guidelines for the management of information to ensure privacy and security, emphasising that confidentiality is a critical component of building trust with children, families, and the community, thereby fostering a safe environment.

Procedures

Managing Privacy and Confidentiality

The service aims to manage personal and sensitive information in an open and transparent way, with clear guidelines relating to how it is collected, stored and shared. All employees of the Service will acknowledge that everyone has the right to ensure their personal information is accurate and secure and will only be used or disclosed to achieve the outcomes it was initially collected for.

The Service will exercise care when needing to discuss personal matters with families or support professionals and will ensure the information remains confidential and cannot be overheard by anyone who is not involved in the matter under discussion. Educators will respect the privacy of children, families, other educators and staff within the Service and refrain from sharing any information that should remain confidential.

The Service will take reasonable steps to protect personal information from misuse, interference and loss, unauthorised access, modification or unauthorised disclosure and will regularly review service practices to ensure compliance with required measures. This includes conducting regular risk assessments of information management systems to identify and mitigate any potential risks to children's privacy.

The Service will ensure individuals are provided with access to their personal information and may request that their information be updated or changed where it is not current or correct. (National Privacy Principle 6 – Privacy Act 1998).

Collection of Information

Families are advised at enrolment and through the *Family Handbook* of the procedures for providing the Service with information it needs in order to deliver its service, including the responsibilities to protect and care for children, families and educators.

The Service will only collect and record information it needs including (but not limited to):

- Personal information for children and families including Centrelink Customer Reference Numbers, names, addresses and contact details for family members and authorised nominees, and children's medical details; and
- Personal information on employees such as emergency contact details, qualifications, recognised training and places of previous employment.

The service is required to maintain the following records and information (see table below):

Record Type		Details	Storage Medium
Child & Family Records	Enrolment Records	• Personal information for children and families • Centrelink Customer Reference Numbers • Authorisations • names, addresses and contact details for family members and authorised nominees • Court orders/parenting plans • children's medical/additional needs details	Child care software
	Health and Medication Records	• Medical conditions details (history, diagnosis, support) • Risk management plans • Action/management plans (including treatment and medication) • Medical practitioner/s details • Immunisation status	Child care software
	Incident, Injury, Trauma and Illness	Details of: • Events including observations, treatment and/or response • Witnesses • Notification and communication	Child care software
	Accounts	• Account statement, transactions, and fees paid/owed	Child care software
Attendance Records		• Days of attendance and absence • Persons signing in and out	Child care software
Evaluations of the Educational Program		• Evidence of the development of the program (reflections, observations, learning stories, planning documents) • Evaluations of children's wellbeing, development and learning (reflections, observations, photos and stories)	Electronic file storage and physical evidence
Staff and Volunteer Record	Employee Personal Details	• Personal information on employees such as emergency contact details, qualifications, recognised training and places of previous employment • Blue card records • Rosters and timesheets • Detail of performance reviews and workplace matters • Details of income and payment information	Employee Files – electronic storage
	Volunteer	• Records of volunteers and students including personal details and days and hours participating	

	Nominated Supervisor	Record of the nominated supervisor and any person in day-to-day charge of the education and care, including suitability information	
	Responsible Person	A record of the name of the responsible person at each session the service operates	
	Educational Leader	A record of the name of the person designated as the Educational Leader	
	Workplace Health & Safety	- Details of accidents, incidents and complaints - Risk management assessments - Copies of notifications supplied to WHS	
Management Records	Records of the service's compliance with the Law	Records of any amendment, suspension, compliance notice or compliance direction, including details of the non-compliance or decision	Electronic file storage
	Complaints and Feedback Records	Information may contain: - Details of grievances, allegations, communication - Identifying information about complainants - Investigation details - Recommendations and outcomes	Secure electronic file storage, Physical copies in locked filing cabinet

Informed Consent

The Service sets out through the enrolment process the procedures for providing informed consent when supplying information to the service. The procedures describe what sort of personal information it holds, for what purposes, and how it collects, holds, uses and discloses that information.

The Nominated Supervisor may disclose personal and sensitive information to Educators and/or the Approved Provider for the specific purpose of administration of the Service and the education and care of children e.g. in relation to food allergies, preferences and cultural requirements. For example, children's photos and the specific foods they cannot have may need to be displayed in places of exposure to other parents/guardians, educators and children.

Medical information obtained from families about their child (e.g. Medical conditions, health management plans, contact details of medical practitioner etc) may be displayed in a prominent position at the Service for the primary purpose of caring for individual children's health/medical needs.

Should the Service seek to share information beyond this purpose, additional explicit and informed consent will be obtained from the parent/guardian.

Documenting learning including Photos and Videos of Children and Young People

As part of the service program planning and documentation photos and videos of children may be taken to be viewed by educators, children and their parents/guardians as part of the service program. Through the Service enrolment process, parents/guardians give authorisation for their child's photograph to be taken and stored by the service. Relevant programming documentation, photos and videos are stored securely and are accessible to educators when required for programming purposes.

If parents/guardians use cameras/videos at the Service, then parents/guardians will be requested to only record their child's inclusion in group events and celebrations on the understanding that they will not publish any material on the Internet, including on their personal social media, as the Service has no control over these images once they are in the public domain.

All documentation, photos and/or videos taken for the purposes of the Service program will be kept for the regulatory required amount of time.

Disclosure of Information

The Service will ensure information is not disclosed to another party without the consent of the individual concerned unless it is a requirement by law, such as:

- Where exceptions may apply regarding information about children when subpoenaed to appear before a court of law,
- Where there is a matter that may put a child at risk of harm or there is a disclosure of harm (refer policy [2.14 Child Protection and Mandatory Reporting](#)),
- Where medical attention is required.

The Service does not disclose personal information to others unless the individual would expect the service to do so, or informed consent has been provided. For example, personal information may be disclosed to:

- Emergency service personnel so they can provide medical treatment in an emergency,
- Trainers or presenters,
- Organisations related to the service (e.g. Other support services),
- The new operator of the service (if relevant), if you have consented to the transfer of enrolment and other documents as listed in Regulation 177 of the National Education and Care Regulations.

The Service may disclose personal information if permitted or obliged to do so by an Australian law. For example, personal information may be disclosed to:

- Authorised officers when the service is assessed and rated,
- Government employees e.g. For child care subsidy, immunisation status, or employment related purposes,
- Software companies that provide childcare management systems,
- Management companies/external consultants we may engage to support the service,
- Lawyers in relation to a legal claim,
- Insurers in relation to an incident at the service,
- Officers carrying out an external dispute resolution process,
- Authorities if we are taking action in relation to unlawful activity, serious misconduct, or to reduce or prevent a serious threat to a child's life, health or safety,
- A debt collection company we use to recover outstanding fees.

The Service will verify the information is accurate and complete before any disclosure.

The Service does not disclose personal information to any person or organisation overseas or for any direct marketing purposes. Sometimes the Service may include information in public communications (e.g. newsletters) or provide information to professionals supporting our business (e.g. accountant). In these situations, the Nominated Supervisor and educators will first de-identify the personal information, so it is not possible to identify individuals. We will not provide personal information to any media outlets e.g. TV or radio stations.

Notwithstanding these requirements, confidential information may be exchanged in the normal course of work with staff and the Approved Provider of the Service and may be given to the Regulatory Authority (Authorised Officer) when this is reasonably needed for the proper operation of the Service and the wellbeing of families or staff (Education and Care Services National Law and Regulation [R.182] and Privacy Act 1988).

Accuracy of Records

The Service will take reasonable steps to ensure personal information that is collected, used and disclosed is accurate, current and complete and will confirm currency of information at least annually or when notified of a change of information.

Parents/guardians and other individuals will be required to advise the Service of any changes that may affect the initial information provided. Educators and other staff will be requested to update their personal information from time to time to ensure the currency of emergency contacts and other relevant information.

Access and Requests for information

Personal information is defined in the Privacy Act 1988 (Cth) and includes any information about an identified individual, such as their home address, email address, telephone number, date of birth, medical records, bank account details, and tax file number.

Parents/guardians may request information from the Service with regard to their child/ren's participation and attendance at the service. All requests for information (from parents/guardians, educators or staff) should be directed to the Nominated Supervisor in the first instance alternatively, the Responsible Person. Where there are concerns held to the right to information or breaching of confidentiality, especially as it relates to a child's safety, requests will be managed by the Approved Provider.

The Approved Provider or Nominated Supervisor will always verify a person's identity before providing access to information, and where relevant, will ensure someone remains with the individual to ensure information is not changed or removed without our knowledge.

Parents/guardians may request access to their child's information, except for where there is a prohibition from a court order (or similar) preventing this access. Parents/guardians are entitled access to:

- Documentation around their children's learning and participation in the educational program,
- Incident, injury, trauma and illness record,
- Medication record,
- Attendance record,
- Their child's enrolment record.

However, if any of these documents will disclose the *personal information* of one of the following people, written consent of that person's information being disclosed must first be obtained before the service can share the information with the parent/guardian—

- a parent/guardian of a child, other than the person requesting the information,
- a person required to be notified of an emergency if a parent/guardian cannot be contacted,
- an authorised nominee of a child,
- a person authorised to consent to medical treatment or to authorise the administration of medication to a child,
- a person authorised to authorise an educator to take a child outside the service premises, or
- a person authorised to authorise the service to transport or arrange transportation of a child.

When a request has been made by a parent/guardian, the Service will confirm the consent before a disclosure is made. Consent may be withdrawn at any time after it has been given, however, withdrawal of consent must be in writing.

Information requested by parents/guardians relating to a child under a court order or parenting plan will be subject to the conditions as per the court order/parenting plan. When necessary, a legally certified request may be required.

There is no charge for making a request to access information however, costs associated with the provision of information that is not for a general purpose may be negotiated, particularly if the gathering and collating of those records is comprehensive. The Service will advise of any associated costs and obtain agreement before proceeding.

In response to information requests that may fit with the above criteria, the Service may provide the information in an alternative way for example by:

- Deleting any personal information which cannot be provided,
- Providing a summary of the information,
- Giving access to the information in an alternative format,
- Allowing access to inspect a hard copy of the information and to take notes.

The Service will advise promptly in writing if access to the information is unable to be provided, or in the format requested and will include the reasons for this as well as information on access to policy [6.7 Feedback and Complaints Handling](#).

Correction of Personal Information

Individuals have a right to request the correction of any errors in their personal information. The requests may be made to the Approved Provider or Nominated Supervisor by telephone, email or by mail.

The Approved Provider or Nominated Supervisor will take reasonable steps to correct personal information that is inaccurate, out of date, incomplete, irrelevant or misleading as soon as it is available. If unable to correct the information, the Approved Provider or Nominated Supervisor will include reasons for this (e.g. it's already current), inform the person about policy [6.7 Feedback and Complaints Handling](#) and their right to include a statement with the information saying they believe it to be inaccurate, out-of-date, incomplete, irrelevant or misleading.

The Approved Provider or Nominated Supervisor will notify other organisations about the correction if this is relevant, reasonable or practical and will also advise the person about the correction if they are unaware.

There is no charge for making a request to correct personal information or for including a statement with your personal information.

Information Security

The Approved Provider will ensure that information is not divulged or communicated, directly or indirectly, to another person other than when authorised by the parent/guardian or allowed/required by law.

The Service protects the individual's privacy by ensuring that the information collected is stored securely, including--

- All relevant hard copy records will be stored in a locked filing cabinet.
- All electronic documents or information will be stored-
 - on devices owned or subscribed by the service only.
 - with suitable password protection/account management.

The Approved Provider is to have administrator/global access to all accounts operated by the service. The Approved Provider is to administer the relevant privileges to allow users access to systems and information accessible to the service's employees/users.

Where a person has responsibility for the security of private and sensitive information, the service expects a high degree of professionalism and integrity is maintained. Any breaches of confidential information will be treated seriously and may result in disciplinary action.

All relevant persons are bound by the code of conduct in the sharing of information and maintaining confidentiality. Breaches of the expectation in keeping information confidential will be treated seriously and may result in relevant action taken by the Approved Provider.

Employees must notify the Approved Provider or Nominated Supervisor about a breach or suspected breach of personal data as soon as they suspect the breach or become aware a breach has occurred. Where there has been a breach of personal and sensitive information, Approved Provider will enact the Data Breach Response Plan and notify individuals and the Australian Information Commissioner (the Commissioner) if personal information is lost (hard copies or electronic), accessed or intentionally/unintentionally disclosed without authorisation, and this is likely to cause one or more persons serious harm.

Where they are satisfied there is no risk of serious harm, the Approved Provider or Nominated Supervisor are not required to notify individuals or the Commissioner about the breach however, appropriate records about the breach will be kept. Approved Provider may choose to advise the individuals concerned about the breach and the action taken.

Confidentiality will also be taken into account with the verbal sharing of information between the Approved Provider, Nominated Supervisor and employees of the Service. Sensitive information will be on a need to know basis taking into account the Service's Duty of Care.

Notifying the Commissioner

Where there is a risk of serious harm after a data breach, Approved Provider will prepare a Statement for the Commissioner which includes the name and contact details of the Approved Provider or Nominated Supervisor, a description of the data breach (including date occurred and detected and who obtained information), the type of information involved (why it may cause serious harm), and the steps individuals at risk of serious harm should take in response to the breach (e.g. steps to request new Medicare card or credit card).

Approved Provider will get specialist advice about the recommended steps if required and may use the Notifiable Data Breach Form available online from the Office of the Australian Information Commissioner to notify the Commissioner.

Notifying Individuals

Where there is a risk of serious harm after a data breach, Approved Provider will notify individuals about the breach as soon as possible using the most appropriate communication methods for the individuals concerned e.g. a telephone call, SMS, physical mail, social media post, or in-person conversation. The information provided is the same as that required for the Commissioner. It might also explain steps the Approved Provider has taken to reduce the risk of harm to individuals.

Approved Provider may notify everyone whose personal information was part of the breach or only those individuals at risk of serious harm. If this is not possible or practical, they may publish a copy of the Statement, for example on their website or Facebook page, and take steps to ensure individuals at risk of serious harm see the publication.

Complaints

If a person believes the Approved Provider have breached Privacy Laws or this Privacy and Confidentiality of Records Policy a complaint may be lodged with the Approved Provider or Nominated Supervisor by telephone, email or by mail. The Approved Provider or Nominated Supervisor will follow the procedures as set out in the Service policy [6.7 Feedback and Complaints Handling](#), to investigate the complaint.

Individuals who are unhappy with the outcome of the investigation may raise their complaint with the Office of the Australian Information Commissioner www.oaic.gov.au or via email enquiries@oaic.gov.au

Sharing of Information in the Protection from Harm

To remove any doubt, the Service's personnel are free from liability or breaching Privacy Principles when sharing confidential information, if they are acting honestly and if their actions in doing so are consistent with the purpose of information sharing (protecting a child from harm) under the Child Protection Act 1999.

Document Retention

The Service will maintain a document retention schedule which will set out the specific records to be kept by the service and the length of time required.

The Nominated Supervisor will prepare documentation for archiving each year. Archived documents will be clearly labelled with planned retention timelines. All archived documentation will be managed by the Approved Provider and stored securely.

In compliance with regulatory requirements, all records pertaining to any child incident, illness, injury or trauma will be kept until the child reaches the age of 25 with reports that include incidents of a sexual nature will be kept for a total of 45 years from the date of the incident.

Management Records

As the Approved Provider, Approved Provider will retain records relevant to the operation and management of an Education and Care service and will ensure they do not include any information that identifies any person other than the Executive members of the Approved Provider.

The Service shall keep all records, in compliance with, and as prescribed under relevant legislation, regulations, local government by-laws and national codes, and as mentioned in specific policies of the

Service. Documentation will be retained as per the relevant timeframe for that record and will include (but not limited to):

- Amendment/Suspension of the Service approval (other than a voluntary suspension),
- Compliance direction/notice issued to the Approved Provider in respect of the Service,
- Records required to maintain compliance with requirements of Child Care Subsidy,
- Complaints made relating to compliance with the Family Assistance Law
- Any notice given to a state or territory body about a child at risk of abuse or neglect,
- Copies of the evidence and information provided with an application for approval about persons with management or control of a provider and persons responsible for the day to day operation of a service
- Any evidence or information produced to obtain police checks and working with children checks for personnel and to support any statements about these checks in an application for provider or service approval.
- Records required to be kept in relation to building and environmental safety including:
 - Emergency and Evacuation instructions/plan for each building,
 - Evacuation signs and diagrams for each evacuation route.

Record Back Up and Off Site information Handling

The Service acknowledges and recognises that considerable amounts of information pertaining to the daily and historical operations of the Service are stored on computer or other files. The storage and long term maintenance of this information is vital in the monitoring of compliance activities and to prevent the Service from losing valuable information therefore it is important to maintain effective storage procedures.

The Nominated Supervisor or other delegated OSHC management team member shall be responsible for conducting a daily/weekly backup of the entire computer system. Some childcare management programs are web based (i.e. cloud computing) and may be automatically updated by the software provider.

A back-up of the entire the Service files shall be done internally as well as on an appropriate external disk drive. Record of the backup shall be maintained in a register and signed by the Nominated Supervisor or other delegated OSHC management team member. The backup shall be taken off site by the Nominated Supervisor other delegated OSHC management team member and returned to site on the following working day.

The Approved Provider shall provide the Nominated Supervisor with an appropriate lockable box in which to store the backup while off site to ensure information is safe, secure and inaccessible to public.

Services may use web based (cloud) data storage systems for back-up and archiving of records. Records of back-up dates and times should be made with access to these records limited to the Approved Provider and the Nominated Supervisor and/or other delegated OSHC management team member. To ensure the safety and security of service records, password protection may be necessary.

Storage of computer data shall be carried out in accordance with any requirements of the organisations insurer. This may involve completion of a risk management plan to ensure all foreseeable risks to data security are considered and managed appropriately.

Any data or memory sticks, compact disks, external hard drives or other computer storage devices purchased by the Service shall remain the property of the Service, especially those that could compromise the safety of a child.

No employee shall be permitted to copy files onto personal storage devices or to email information off site other than to an approved off site data storage company, unless express written consent is provided by the employer for a specific purpose related to the care of a child.

Data storage devices (external drives and back-ups) shall be checked weekly to ensure appropriate functioning.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.175 Offence relating to requirement to keep enrolment and other documents
- **Education and Care Services National Regulations:**
 - R.87 Incident, injury, trauma and illness record
 - R.92 Medication record
 - R.145 Staff record
 - R.151 Record of educators working directly with children
 - R.158 Children's attendance record to be kept by approved provider
 - R.160 Child enrolment records to be kept by approved provider and family day care educator
 - R.161 Authorisations to be kept in enrolment record
 - R.162 Health information to be kept in enrolment record
 - R.167 Record of service's compliance
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.181 Confidentiality of records kept by approved provider
 - R.183 Storage of records and other documents
 - R.184 Storage of records after service approval transferred
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Privacy Act 1988 \(Cth\)/ Information Privacy Act 2009 \(Qld\)](#)
- [Child Protection Act 1999 \(Qld\)](#)
- [A New Tax System \(Family Assistance Administration\) Act 1999](#)
- Department of Education - [Child Care Provider Handbook](#)
- [Public Records Act 2002 \(Qld\)](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [1.1 Educational Program Development and Implementation](#)
- [1.4 Excursions, Incursions and Regular Outings](#)
- [1.8 Use of Artificial Intelligence \(AI\) Technology](#)
- [2.1 Providing a Child Safe Environment](#)
- [2.2 Supervision and Educator Ratios](#)
- [2.3 Safe Arrivals and Departures of Children](#)
- [2.4 Incident, Injury, Trauma and Illness](#)
- [2.5 Administration of First Aid](#)
- [2.9 Medical Conditions in Children](#)
- [2.10 Administration of Medication](#)
- [2.13 Emergency Evacuation, Lockdown and Drills](#)
- [2.14 Child Protection and Mandatory Reporting](#)
- [4.3 Working with Children Checks and Management](#)
- [4.5 Volunteers and Students](#)
- [4.6 Code of Conduct](#)
- [4.7 Employee Development and Performance Review](#)
- [4.8 Employee Qualifications – Monitoring Progress](#)
- [4.9 Fitness for Work](#)
- [4.10 Managing Employee Underperformance and Misconduct](#)

[4.11 Prevention of Workplace Bullying, Discrimination and Harassment including Sexual Harassment](#)

[7.1 Nominated Supervisor](#)

[7.2 Determining the Responsible Person](#)

[7.3 Educational Leader](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.7 Managing Notifications](#)

[7.8 Policy Development, Review and Implementation](#)

[7.9 Budgeting, Procurement and Financial Planning](#)

[7.11 Child Care Subsidy \(CCS\) and Additional Child Care Subsidy \(ACCS\) Management and Compliance](#)

[7.12 Workplace Health and Safety](#)

Policy 7.6 Privacy and Confidentiality of Records		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Address regulatory changes		
V1-06.2024 – No updates		
V2-03.2025 – Added additional information to all roles and responsibilities, added procedures relevant to privacy and confidentiality, collection of information, informed consent, disclosure of information, accuracy of records, access and requests for information and document retention.		
V3-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced key tasks and responsibilities, minor wording and enhancements to procedure, additional regulatory context and guidance to align with child safe standards.		
V4-04.2026 – Added families and enhanced roles and responsibilities, enhanced procedures relevant to managing privacy and confidentiality, disclosure of information, access and requests for information		

7.7 Managing Notifications

Policy Statement

The Approved Provider recognises its obligation to ensure sound reporting and information sharing is established and effective and recognises as an approved Education and Care Service it must notify authorities within statutory guidelines to ensure compliance.

The Service will ensure notifications are made as required and to the relevant authority. This policy and procedure developed by the Service aims to identify specific obligations for staff and management to ensure proper internal and external reporting.

Roles and Responsibilities

Approved Provider	• Seek appropriate advice from the Regulatory Authority, when required, particularly in matters related to child safety and risk management. • Report all matters outlined in the regulations for notification to the Regulatory Authority. • Report other notifiable information to relevant bodies as required including child protection authorities and the Queensland Family and Child Commission.
Nominated Supervisor	• Report relevant matters to the Approved Provider as relevant. • Seek support and advice from the Approved Provider for significant matters, especially those that may pose a risk to a child's safety or wellbeing. • Communicate with parents/guardians routinely, ensuring significant matters are notified in a timely manner, and at a minimum within 24 hours. This communication will be conducted in a culturally safe and respectful manner, ensuring families feel informed and supported. • Support staff to report and record information timely and accurately. This includes training on how to identify and report signs of harm, abuse, or neglect. • Ensure compliant storage of reports and information. This includes maintaining secure systems to protect the privacy and confidentiality of children, particularly when sensitive information about their cultural identity or family circumstances is involved.
All Staff	• Record and report information necessary for notification to the Regulatory Authority. • Seek support from the Nominated Supervisor (or relevant other) where required, especially when a child's safety is at risk. • Acknowledge and respect a child's cultural identity and ensure all communication and reporting is culturally safe.

Key Tasks and Responsibilities

Managing access to reporting systems	The Approved Provider is to have the administrator access to all accounts associated with the service and is responsible for delegating access to employees. Access will be restricted to a "need-to-know" basis to enhance child safety and protect sensitive information.
Submitting notifications	Typically, the Nominated Supervisor will act on behalf of the Approved Provider and submit relevant notification on their behalf. The Nominated Supervisor will receive training on all mandatory reporting requirements and the importance of timely and accurate information sharing to protect children.

Procedures

All educators are to communicate any concern, incident or suspicions to the Nominated Supervisor or Responsible Person as soon as practicable. This includes any concerns related to a child's safety, wellbeing, or cultural safety.

Once an incident has been managed the Nominated Supervisor or Responsible Person has the role in ensuring reporting to the Approved Provider is completed within a lawful and reasonable timeline.

The Approved Provider will be the first contact. Where this is not achievable or suitable the Nominated Supervisor or Responsible Person will accept the communication on behalf of the Approved Provider.

The Nominated Supervisor and Approved Provider will decide on a plan of action and tasks to be undertaken in order to adequately respond and meet reporting requirements. This plan will prioritise the child's safety and wellbeing above all other considerations.

National Quality Framework (Regulatory) Notifications

NQAITS Portal – Notification Submissions

The relevant delegate must make the submission on behalf of the Service to the Regulatory Authority using the National Quality Agenda IT System (NQA IT System).

The management of user accounts will be delegated at the discretion of the Approved Provider, it is expected this would include:

- Any Nominated Supervisors,
- Any other relevant Responsible Persons and/or administrators.

Procedures specify the circumstances where notifications are to occur and the role responsible for making relevant submission. For circumstances outside of incidents and complaints, it will be a representative of the Approved Provider who will manage notifications and the submission of attachments.

Regulatory Authority Notifications

The National Law and Regulations sets out particular circumstances and information that must be provided to the Regulatory Authority within strict timeframes. These are outlined in the following table:

Incidents and Complaints		
Serious incident - Death of a child		As soon as practicable, but within 24 hours
Serious incident	Any incident involving serious illness of a child while being educated and cared for which the child attended or ought reasonably to have attended a hospital	Within 24 hours
	Any incident involving serious injury or trauma to a child while being educated and cared for which the child attended or ought reasonably to have attended a hospital, or a reasonable person would consider that the child would require urgent attention from a registered medical practitioner	
	Any emergency for which emergency services attended	
	A child is missing or cannot be accounted for or appears to have been removed from the premises by a person not authorised by a parent	
	A child is mistakenly locked in or out of the premises or any part of the premises	
	Any complaint alleging that a serious incident has occurred or is occurring at an education and care service, or the National Law has been contravened	
Any incident that requires the approved provider to close, or reduce the number of children attending the service for a period		
The centre-based service is educating and caring for extra child/ren due to an emergency		

Any circumstance at the service that poses a risk to the health, safety or wellbeing of a child attending the service	Within 7 days
Any incident where the approved provider reasonably believes that physical or sexual abuse of a child or children has occurred or is occurring while the child is being educated and cared for by the service	Within 24 hours
Allegations that physical or sexual abuse of a child or children has occurred or is occurring while the child is being educated and cared for by the service	
Change to information about Approved Provider	
Change to address or contact details of approved provider	Within 7 days
Any change relevant to approved provider's fitness and propriety	
The appointment of receivers or liquidators to the approved provider or any matters that affect the financial viability and ongoing operation of the service	
Death of approved provider	
Notice of any appointment or removal of a person with management or control of service	Within 14 days
Notice of change in name of approved provider	
Change to information about education and care service	
Any change to the hours and days of operation of the service	Within 7 days
Any proposed change to the premises	
Ceasing to operate the education and care service	
A nominated supervisor is no longer employed at the service, is removed from the role or withdraws consent to the nomination	
Adding nominated supervisor(s)	At least 7 days prior to commencement (or as soon as practicable but no more than 14 days after commencement)
Suspension or cancellation of a working with children card or teacher registration of a nominated supervisor, or disciplinary proceedings of a nominated supervisor under an education law	Within 14 days
Intention to transfer service approval	At least 42 days

Department of Education and Training Notification (CCS)

All CCS reporting is submitted via the service's child care software or the Provider Entry Point (PEP). OSHC must report relevant information to ensure compliance, including about the following matters:

Matters to be notified	Timeframe
The number of anticipated vacancies (an ongoing OSHC full-session vacancy).	By 8.00 pm (AEST) each Friday.
The total hourly fee charged by the service including any change to the fee information.	Within 14 days
Any change to the operating hours.	
Ceasing to operate an approved child care service.	At least 42 days
Ceasing to operate to avoid being in breach of a law of the Commonwealth, a state or a territory or due to circumstances beyond the provider's control (when 42 days' notice cannot be given).	Within 24 hours after ceasing to operate the service.
Change of physical or postal address of the provider or the service's premises.	No later than 30 days
Change to the name of the provider or the service.	Within 14 days
Change contact details (email, website, phone, fax) of the provider or service:	
Information about any new person with management or control of the provider (including any person who becomes responsible for the day-to-day operation of any of the provider's approved child care services)	Within 7 days
Change of the name or contact details for a person with management or control of the provider (including any person who is responsible for the day-to-day operation of any of the provider's approved child care services)	

The provider becomes aware, because of a background check undertaken for a specified person, that the person: - has a serious conviction or finding of guilt for any of the following offences under a law of Australia or of a foreign country - an indictable offence punishable by a maximum of two years imprisonment or 40 penalty units - an offence involving violence or a sexual offence - an offence involving fraud, stealing or dishonesty - is an undischarged bankrupt, or - was a director or secretary of a corporation when the corporation went into administration, receivership or liquidation, or at any time during the 12 months beforehand.	
An event or circumstance in relation to a person with management or control of the provider (including a person responsible for the day-to-day operation of any of the provider's approved child care services) that reasonably indicates that the person is not likely to be a fit and proper person to be involved in the administration of Child Care Subsidy.	
A person stops having management or control of the provider (including when a person stops having day-to-day responsibility for the operation of any of the provider's approved child care services).	
An educator obtains a child care qualification from a registered training organisation	
A provider or a person with management or control of the provider obtains an interest, or is likely to obtain an interest, in a business which may affect their ability to comply with Family Assistance Law, where the approval may benefit the business or where a conflict of interest might reasonably be perceived to exist.	
Change in the status of a working with children card (blue card) for anyone who is required to have such a card	
The provider enters into administration, receivership, liquidation or bankruptcy, and the details of this event.	
Unexpected closure of any of the provider's approved child care services due to unforeseen circumstances.	
A serious conviction or finding of guilt of a person with management or control of the provider (including a person who becomes responsible for the day-to-day operation of any of the provider's approved child care services),	Within 24 hours

Additional Reporting

Mandatory Reporting (Child Protection)

Where a staff member of the Service has a reasonable suspicion a child may be in need of protection they are to follow policy [2.14 Child Protection and Mandatory Reporting](#) and report the matter to Child Safety as per legal obligations. Service policies and procedures emphasise the importance of all staff understanding and fulfilling their mandatory reporting obligations and recognise that early intervention is critical for child safety and wellbeing.

Work Health Safety

The *Work Health and Safety Act 2011* sets out what sort of incidents are notifiable to Work Health and Safety Queensland (WHSQ). Circumstances surrounding notifications and reporting is set out in policy [7.12 Workplace Health and Safety](#).

Public Health

While unlikely, there is potential for the Service to report relevant occurrence of infectious diseases to the local Public Health Unit. Circumstances surrounding notifications and reporting is set out in policy [2.7 Infectious Diseases](#).

National Early Childhood Worker Register

The Approved Provider must record, maintain and update worker information in the National Early Childhood Worker Register through the NQA IT system within 14 days of the person being employed, engaged or appointed. This requirement includes:

- Educators (permanent, fixed term, casual or agency),
- Volunteers, regardless of how often or the number of hours they attend,
- Students or trainees completing placements, practicum or vocational training,
- Non-educator staff such as cooks, cleaners, maintenance staff, administrative staff and bus drivers,
- Nominated supervisors,
- Coordinators,
- External providers directly or indirectly engaged to deliver activities or programs as part of the education and care program during operating hours while children are present.

Reports and Records

All relevant reports and records will be stored in accordance with the procedures listed in [7.6 Privacy and Confidentiality of Records](#). This is a key component of child safe practices, ensuring that information is managed in a way that protects children's privacy and dignity.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.173 Offence to fail to notify certain circumstances to Regulatory Authority
 - s.174 Offence to fail to notify certain information to Regulatory Authority
 - s.175 Offence relating to requirement to keep enrolment and other documents
 - s.269E Approved provider must give information to the National Authority for the National Early Childhood Worker Register
- **Education and Care Services National Regulations:**
 - R.12 Meaning of serious incident
 - R.154A National Early Childhood Worker Register
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.174 Time to notify certain circumstances to Regulatory Authority
 - R.174A Prescribed information to accompany notice
 - R.175 Prescribed information to be notified to Regulatory Authority
 - R.176 Time to notify certain information to Regulatory Authority
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Privacy Act 1988 \(Cth\)/ Information Privacy Act 2009 \(Qld\)](#)
- [Work Health Safety Act 2011 \(Qld\)](#)
- [National Principles for Child Safe Organisations](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [2.1 Providing a Child Safe Environment](#)
- [2.3 Safe Arrivals and Departures of Children](#)
- [2.4 Incident, Injury, Trauma and Illness](#)
- [2.5 Administration of First Aid](#)
- [2.7 Infectious Diseases](#)

- [2.13 Emergency Evacuation, Lockdown and Drills](#)
- [2.14 Child Protection and Mandatory Reporting](#)
- [7.1 Nominated Supervisor](#)
- [7.4 Leading Compliance and Quality Assurance](#)
- [7.5 Governance and Management](#)

Policy 7.7 Managing Notifications		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V1-03.2025 – No updates		
V2-10.2025 – Enhanced roles and responsibilities, enhanced key roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with regulatory changes and child safe standards.		
V3-04.2026 – Added additional reporting procedures relevant to the National Early Childhood Worker Register, added reference to National Law and Regulations.		

7.8 Policy Development, Review and Implementation

Policy Statement

The Service acknowledges the fundamental need for effective policy and procedures to guide and manage the service's delivery and the duties of employees with a commitment to prioritising the safety, wellbeing, and cultural safety of every child. The Service policies should reflect the statutory obligation of the service and its employees, specifically embedding child safe principles and requirements. Therefore policies should be developed through integrating a wide range of relevant information sources including legislation, guidelines and operating handbooks as well as best practice in child protection and cultural responsiveness.

The Service policies and procedures will undergo regular review to support the effectiveness and coverage ensuring they remain dynamic tools for creating a child-safe and culturally affirming environment. The Approved Provider will maintain the authority to approve and endorse developed policy; however, The Service employees will have an active role in facilitating policy review and the drafting of new and amended policy, drawing on their direct experience in safeguarding children. The Service suite of policies will be reviewed at least **annually** or where required, especially in response to any incidents, feedback, or changes in child protection legislation or best practice guidelines.

The Approved Provider also recognises their duty to comply with *Education and Care Service National Regulations 168, 170-172* to ensure relevant policies are developed, accessible by employees and families. The Service will ensure it upholds adequate notification to families where there are changes to policies, communicating these changes clearly and accessibly, and offering opportunities for families to understand their implications, particularly for child safety and cultural practices.

Roles and Responsibilities

Approved Provider	• Develop and implement required policies for regulatory compliance, explicitly embedding child safe practices, standards and principles for safety for all children. • Support ongoing development and review of service policies to drive quality education and care, with child safety and wellbeing at the forefront of all policy decisions. • Review and endorse (ratify) proposed policy suggestions, ensuring they meet the highest standards for child protection and cultural responsiveness. • Ensure access and compliance with policies, addressing concerns as they arise, particularly any non-compliance that could compromise child safety or cultural safety.
Nominated Supervisor	• Support the Approved Provider through identifying, drafting and proposing amended changes to policies, with a deep understanding of practical child safety measures and cultural considerations within the service. • Maintain a record of amendments and changes to service's policies. • Maintain accurate knowledge of service's requirements and advise the Approved Provider of any required policy developments, especially in response to emerging child safety risks or cultural diversity needs. • Monitor and supervise the implementation and compliance of policies actively observing and supporting staff adherence to child safe practices and culturally safe interactions. • Ensure employees, families and other relevant stakeholder are provided with access and information to policies as required, using accessible language and methods that promote understanding across all cultural backgrounds.
All Staff	• Contribute ideas, wishes and insights to the quality and coverage of policies, particularly drawing on their direct experience with children and families to enhance child safety and cultural safety.

	• Ensure policies and procedures are followed at all times, recognising their personal responsibility in creating a child-safe and culturally inclusive environment.

Procedures

Policy and Procedures Quality Standards

The Service will develop policies and procedures which reflect the true nature of the Service operations with a foundational commitment to nurturing children's safety, wellbeing, and cultural identity. Where possible, specific roles will be identified to outline responsibilities, delegation and legislative obligations will be reflected and explicitly stated with clear accountabilities for child protection and cultural safety woven throughout.

The Service will ensure that generic policy documents, samples and templates adopted are reviewed and customised to meet the individual and unique circumstance of the Service always assessing their alignment with current child safe practices and the diverse cultural needs of children and families.

All policies will include references to external documentation, resources, guidelines and principles used to develop or guide the development of the policy with a particular emphasis on authoritative sources for child protection and cultural competence. Version control will be used to manage policy development and communication records.

Policy sourcing should also take into considerations other provisions such as copyright laws and appropriate referencing styles. Relevant Laws and other Provisions shall be articulated and considered also as policy reference and source points including any specific guidelines from relevant child safety bodies.

Any written materials developed by employees, volunteers or other agents, specifically for the purpose of the Service, shall remain the intellectual property of the Service.

Policy Review

Policies will be developed or amended either as needed or as a result of periodic review. This includes proactive reviews in response to new research, community feedback, or identified areas for improvement in child safety and cultural responsiveness.

The suite of policies will be reviewed by the Nominated Supervisor **annually** and at a minimum every **two years** for other policies or where required. The Nominated Supervisor can delegate out aspects of the review to suitably capable educators. The Nominated Supervisor will present a report of the review to the Approved Provider highlighting any findings or recommendations related to enhancing child safety, wellbeing, and cultural safety.

Any proposed amendments or policy development will be drafted and submitted to the Approved Provider for ratification/approval.

Policy Approval

Policies and procedures may be drafted by:

- Suitably capable employees,
- the Approved Provider; or
- with prior approval, an appropriate third party.

Where substantial change is being proposed, the writer should consult with the Approved Provider to discuss a summary of the proposal. This consultation will specifically address how proposed changes may align with current child safe practices and standards. Additional consultation may be directed as part of policy development.

All written materials will be marked 'draft' until ratified or endorsed by the Approved Provider who will review proposed policies and can either:

- ratify,
- reject, or
- request amendments.

All ratified policies will have the date and version recorded.

Policy Compliance

Employees are expected to maintain compliance with service policies at all times as a fundamental commitment to the safety and wellbeing of every child in their care. Employees will be provided with adequate induction to orientate their knowledge of the Service procedures and expectations for performance and conduct with a significant focus on their individual responsibilities for child safe practices and cultural competence.

Policies will be made accessible, and where possible, will outline clear expectations and responsibilities to support employees in their duty, emphasising their role in preventing harm and fostering a safe and respectful environment for all children.

Where employee's conduct for performance is not consistent with the Service policies, especially concerning child safety or cultural safety, the employee will be managed by the procedures outlined in policy [4.10 Managing Employee Underperformance and Misconduct](#).

Policy Accessibility

The Service's full policy and procedure manual will be available at the Service premises for employees, volunteers and families to access when required. This accessibility ensures transparency and empowers all stakeholders to understand the service's commitment to child safety and cultural responsiveness.

Policy Notification and Communication

The Approved Provider will ensure families are notified at least 14 days before any policy or procedure referred to in National Regulation 168 takes effect. Notification to families will include email messages and signage at the Service. The date of notification will be recorded on the policy (where relevant). This notification will be clear, culturally sensitive, and highlight any changes that directly impact child safety, wellbeing, or cultural practices within the service.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.173 Offence to fail to notify certain circumstances to Regulatory Authority
 - s.174 Offence to fail to notify certain information to Regulatory Authority
 - s.175 Offence relating to requirement to keep enrolment and other documents
- **Education and Care Services National Regulations:**
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.172 Notification of change to policies or procedures
- **National Quality Standard:**
 - QA4 – Staffing arrangements
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [National Principles for Child Safe Organisations](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[7.4 Leading Compliance and Quality Assurance](#)

[7.5 Governance and Management](#)

Policy 7.8 Policy Development, Review and Implementation		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V1-03.2025 – No updates		
V2-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards.		
V3-02.2026 – Minor changes to policy wording and procedures to reflect annual policy reviews for reg 168 policies		
V3-04.2026 – No updates		

7.9 Budgeting, Procurement and Financial Planning

Policy Statement

The Approved Provider seeks to implement measures which provide financial protection and minimise the risk of fraudulent, inappropriate or negligent financial practices. The Service takes a responsible approach to fiscal planning and spending to ensure these risks are well managed with financial management practices designed and implemented to protect both the financial reputation of the organisation and its ongoing viability and, most importantly, to ensure that the necessary resources are available to provide a safe, high-quality, and culturally affirming environment for every child.

To ensure the effective and efficient management of the service, the Approved Provider and Nominated Supervisor will work collaboratively together to develop workable and responsible budgets and financial planning guidelines for the ongoing operation of the service, with a primary focus on allocating funds to support child safety, wellbeing, and cultural safety.

The following principles will be adopted and reflected in all purchasing decisions of the Service:

- Open, transparent and effective communication,
- Value for money,
- Enhancing the capabilities of local business and industry,
- Environmental protection; and
- Ethical behaviour and fair dealing
- Prioritising the purchase of resources and services that directly enhance child safety, wellbeing, and cultural responsiveness.

Roles and Responsibilities

Approved Provider	• Establish sound processes for the service's financial management consistent, with clear oversight to ensure funds are used to support a child-safe culture. • Ensure budgets are prepared and are adequate to meet the needs of providing quality education and care, including sufficient allocation for staff training in child protection, cultural safety, and trauma-informed practices, as well as for the maintenance and purchase of safe, age-appropriate, and culturally relevant equipment and resources. • Use judgement and act in a manner that supports the principles of the policy for purchasing decision, always considering the impact on children's safety and wellbeing.
Nominated Supervisor	• Monitor the service's day-to-day spending and financial management, ensuring compliance with organisational policy and procedures and reporting any discrepancies that could compromise the quality of care or child safety. • Support the Approved Provider in preparing, reporting and reviewing service budgets and financial reports, providing detailed rationale for any requested expenditure related to child safety or cultural competence initiatives. • Coordinate and supervise the processing of fees and income. • Use judgement and act in a manner that supports the principles of the policy for purchasing decision, with a commitment to purchasing items that are culturally safe and do not pose a risk of harm to children. • Report any concerns or issues immediately to the Approved Provider, particularly financial issues that could impact the service's ability to provide a child-safe environment.
All Staff	• Follow the service's procedures for spending within the level of authority, approval or delegation, and actively identify and request resources that would enhance a child's safety, wellbeing, and sense of belonging.

Procedures

Annual Budget

A budget will be prepared for the Service by the Approved Provider, this will provide guidance on spending and additional resourcing for the service.

The budget will reflect the provision of quality care and include at least the following items:

- Staffing arrangements (remuneration and associated costs for qualified and adequate staff) including the costs of robust recruitment and screening processes to ensure staff suitability,
- Facilities and asset maintenance/replacement, with a priority on maintaining a safe physical environment free from hazards.
- Program, medical and safety equipment (or replacement), including resources that support children's emotional regulation, cultural learning, and physical safety.
- Professional development needs, with dedicated funding for training in child protection, cultural safety, and responding to trauma.
- Costs of care (food, consumables etc.), ensuring culturally appropriate and safe food options are available for all children.

The Approved Provider and Nominated Supervisor may seek external expertise to inform budgets using relevant industry standards.

The approved budget will form the standard purchasing delegation for the Nominated Supervisor to purchase or procure items using the following guide to approval.

Purchasing and Procurement

<i>Items under \$500</i>	• General purchasing for day to day operational items such as groceries, consumables, arts and crafts materials and replaceable items such as sports equipment will be done in accordance with the approved service budget by (or overseen by) the Nominated Supervisor. All items purchased must be safe for children and culturally inclusive. • The Approved Provider will ensure that the Nominated Supervisor has access to accounts for the efficient purchasing of day to day items. • Purchasing of items of less than \$150 includes the use of petty cash or use of bank or other business accounts (e.g. Officework or grocery account).
<i>Items \$500 to \$1,000</i>	• The purchase value of single items over \$500 should be approved by the Approved Provider prior to purchase, even if the items have been included in the service's annual operational budget. • Other purchase requests must be in writing to the Approved Provider of the service. The responsibility for ordering will be with the service Nominated Supervisor or Administrator. • In extenuating circumstances, authorisation for purchases of single items over \$500 may be approved in events of emergency where two approved members of the executive have been contacted and agreed to the expense. Documentation of such discussion will be made and presented at the next Approved Provider meeting. This emergency procedure must still prioritise the immediate safety and wellbeing of children
<i>Items above \$1,000</i>	• All purchases over \$1,000 will require two written quotes or research evidence. • Purchases over \$3,000 will require three written quotes or research evidence depending on the scope of purchase. • All quotes will also be evaluated based on the item's benefit to a child-safe and culturally affirming environment.

The Approved Provider will ensure that the purchasing policy does not negatively impact on the efficient operations of the service and that all purchase requests are followed up in a timely manner.

The Service will avoid using cash for purchasing, where possible. The Approved Provider has made load 'n' go (pre-paid credit card) facilities available.

All purchasing will require an appropriate receipt to be retained. These financial documents will be stored and collated for bookkeeping and reporting purposes.

Strategic Planning

The Approved Provider together with the Nominated Supervisor shall plan an annual meeting to strategically review operations and to take a planned approach to the organisation's future. This strategic review will include a specific agenda item to assess the effectiveness of the service's policies and procedures in meeting child safe standards and fostering a culturally safe environment.

The Approved Provider may seek external support and advice in the development of a strategic and operations plan as required.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations**
- **National Quality Standard:**
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Parents & Citizens Accounting Manual](#)
- [National Principles for Child Safe Organisations](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[7.5 Governance and Management](#)

[7.10 Fees, Statements and Parent Gap Fee Payments](#)

Policy 7.9 Budgeting, Procurement and Financial Planning		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V1-03.2025 – No updates		
V2-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards.		
V2-04.2026 – No updates		

7.10 Fees, Statements and Parent Gap Fee Payments

Policy Statement

This policy aims to outline the procedures and guidelines relating to the setting and payment of fees and the distribution of statements. Fee information is well published to ensure clarity and transparency. The Service is committed to maintaining equitable and clear fee processes to safeguard the interests of our service and families.

The commitment to follow policies, including payment of the Service fees are a condition of enrolment. Enrolment will be cancelled or suspended where fees are not paid or otherwise remain overdue. Families experiencing difficulty with payment are encouraged to discuss this with the Nominated Supervisor to explore possible solutions.

Setting of Fees

The Approved Provider sets a relevant fee structure based on the annual budget required for the provision of a quality OSHC service. The budget is informed by the forecast of the resources needed to uphold the Service philosophy, goals, and duties. The fee structure also includes the relevant notice period required for fees to be waived.

The fees of the Service are well communicated to ensure transparency and informed requests for care. Where fees are amended, parents/guardians will be adequately informed of the changes.

Child Care Subsidy

The Service is approved to administer the Child Care Subsidy to relevant families who meet eligibility guidelines (including residency, activity and immunisation). This payment reduces the out-of-pocket expenses for families. CCS rules require families must make a co-contribution by paying the gap fee. Parents/guardians will also be responsible for managing CCS entitlements and are liable for any fee gap.

Children may also be entitled to ACCS payments, these will be managed in accordance with the specific guidelines and requirements.

Payment of Fees

Fees will be paid, for all days booked, by Friday each week. Accepted payment method is direct debit through the service's childcare software management system.

In the event Approved Provider makes changes to the amount or the way in which fees are charged, the Service will communicate this change at least **14 days** before changes taking effect. Communication will occur via email, notices and newsletter updates.

Statement of Fees

The Service will issue a Statement of Fees to account holders each week, consistent with the billing cycle. Account holders (parents/guardians) are to notify the Nominated Supervisor if they believe there is an error in their billing or fees charged.

Roles and Responsibilities

Approved Provider	Maintain compliance with Family Assistance Law, Education and Care Services National (Queensland) Law 2011 and Education and Care Services National Regulations 2011 and any other applicable laws relating to operating an education and care service by remaining up to date through annual training and remaining informed of related legislation and best practice.

	- Nominate responsible people for the accuracy of data submitted (Nominated Supervisor and other) to the Department of Education Early Childhood in relation to the administration of the Child Care Subsidy CCS - Undertake an annual review of fees charged based on annual budget required for the provision of quality OSHC. - Comply with Child Care Subsidy requirement including the management being 'fit and proper persons'. - Ensure systems to manage fees (including third-party software) and record keeping practices reflect the requirement of the Child Care Provider Handbook. - Maintain records of parent gap fee payments for the required timeframes as per the Family Assistance Law. - Ensure all families are aware of the Fees, Statements and Payment of Gap Fees Policy. - As per Family Assistance Law requirements, provide families with regular statement of fees payable. - Ensure family gap fee payments are managed and accounted for through electronic funds transfer. All gap fee payments receipted and applied against the family account in the service's CCMS 3rd party software to ensure compliance with regulatory requirements.
Nominated Supervisor	- Respond to concerns or issues raised by parents/guardians /account holders. - Ensure practices reflect the requirements outlined in the Child Care Provider Handbook. - Communicate accrued debts and payment issues to the Approved Provider. - Approve fee payment arrangements with families for overdue fees and refer to Approved Provider where necessary.
Nominated Supervisor/ Administrator	- Undertake the issuing of statement and collection of fees as directed by the Approved Provider and procedures below. - Submit session report and enrolment information to Department of Human Services. - Monitor family account balances to ensure payment of gap fees on a regular basis via electronic funds transfer. Family accounts with overdue or outstanding balances will be followed up by the Coordination Team. - Discuss fee payments with families and refer to Nominated Supervisor if fees remain unpaid.
Families	- Provide the Service with the correct enrolment details to facilitate the CCS claim, if required, including: - Centrelink Reference Numbers (CRN) for child and CCS claimant - Date of Birth for child and CCS claimant - Notify Centrelink of any changes that may affect their CCS entitlement. - Make regular fee payments by ensuring a direct debit arrangement is in place and funds are available in order to clear all payments. - Discuss with the Nominated Supervisor any difficulty in meeting fee payments or any queries for suitable arrangements to pay outstanding amounts. - All attendance records are accurately completed and are only to be completed for 'actual' attendances and absences if the child did not attend a scheduled session. - Contact the Service as soon as practicable, if their child is unable to attend a particular session of care.

Key Tasks and Responsibilities

Set fees and structure	The Approved Provider is responsible for setting fee amounts and structures. These are supported by the Nominated Supervisor to ensure this information is published, readily available to families and changes/increases are appropriately communicated.
Manage transactions and processing	The Nominated Supervisor is responsible for managing charges and transactions on behalf of the service and ensuring records of these transactions are accurate.
Managing debt	The Nominated Supervisor is the first point of contact for resolving debt and missed payments. Should no payments be received, the Approved Provider will be responsible for approving suspension of enrolment and debt collection activities.
Issue statements and address enquires	The Nominated Supervisor will manage the issuing of statements and be the primary point of contact for any enquiries or questions relating to charges.

Procedures

Fee Structure

The current fees for the service are included in a **Fee Schedule**. The Fee Schedule can be found on the service's website and is displayed in the OSHC office.

Vacation Care Fees

Excursion and incursion fees are compulsory according to days booked and fees will be calculated following a cost analysis for each event.

Late Collection Fees

Closing time is 6.00pm. Parents/guardians who collect their children after this time will incur an administration fee of \$20 for the first 15 minutes (or part thereof) and \$1 per minute thereafter.

Fee Payment

Accepted payment methods is direct debit only through the service's childcare software management system. The receipt of all payments will be set out in the statement of fees emailed to parents/guardians.

Fees will not be charged for Public Holidays when the Service does not operate or when closed over the Christmas and New Year period.

If a family has permanently cancelled care and their account is in credit, they must provide written instructions to the service indicating:

- A refund is required and have provide account details for transfer, or
- A donation of credit balance to the service

Unexpected Events

Refer policy [7.13 Service Closure](#)

If the Service is closed by reason of an unexpected event, then fees will be payable by families for the day (or days) of closure due to that unexpected event.

Fees paid in relation to a period of closure due to unexpected events may be refunded in whole or in part at the sole and absolute discretion of the Approved Provider.

The Approved Provider will take the following factors into account when determining if fees will be payable in relation to a period of closure of the Service:

- The time period that the Service is closed,
- Whether such closure was reasonably foreseeable,

- The costs incurred by the Service even during the period of closure (staff wages, rent and other fixed costs); and
- Whether such fixed costs could be reasonably reduced or mitigated in the circumstances.

Managing Overdue Fees and Debt Collection

Parents/guardians in hardship are encouraged to discuss their matters with the Nominated Supervisor to explore possible options and access to additional supports prior to account being in arrears.

Where there are outstanding fees, and no payment has been made in at least 2 weeks the Nominated Supervisor will prompt the parent/guardian verbally and confirm the agreed arrangement via email.

- If no payment has been received as agreed or where there has been consistent failure to pay accounts, the Approved Provider will be notified and will contact the parent/guardian/account holder for immediate remedy.
- The Approved Provider will outline the terms of payment of the service and seek to address an ongoing resolution. Parents/guardians will be informed that continued enrolment is dependent on the payment of the fees outstanding.

Where no contact can be made, or where payment of fees continues to have not been received within the agreed timeframe, the enrolment will be suspended, and the debt may be referred to a collection agency (or QCAT).

Where resolution through suspension has not been achieved the Approved Provider may, in its discretion, cancel the enrolment and suspend any future attendance.

Payment Plans

The Nominated Supervisor will develop a payment plan with the parent/guardian. However, the following must be taken into consideration in any negotiations:

- The amount of care being used by the family,
- The amount of money the family will realistically be able to pay to the Service each week,
- The amount of fees that will accumulate overtime with only partial payment being made on the account/fees,
- The short-term versus long-term viability of the payment plan,
- And the upper limit of outstanding fees that Approved Provider are willing to let the account accrue before pursuing the payment, including but not limited to emailing, calling, and texting the account holder, and use of the account bond payment.

All payment plans will be in writing on the Service letterhead with the Nominated Supervisor's name, signature and date the agreement was drafted. Payment plans must outline the terms and conditions of the payment plan fee schedule including:

- Amounts of money, agreed timelines and deadlines to be paid by, and
- Details relating to non-compliance of the payment plan in the form of pursuing payment, and
- Potentially suspending the family's booking and placement.

The parent/guardian must sign and date the payment plan where indicated to acknowledge that they agree with the payment plan terms and conditions. A physical copy of the payment plan and all written communications up until this point are to be kept printed in the family/child's file.

Fee Increases

Fees are reviewed annually by the Approved Provider in consultation with the Nominated Supervisor. Typically, fee adjustments will occur at the start of each school year. Fee increases are based on the provision of quality Outside School Hours Care, reflecting the costs associated with meeting the service's philosophy, goals of the program and within the framework of the service's policy and procedures.

Communication of fee changes occur at least **14 days** before making changes to the rate of fees or introducing new changes. Notification of fee changes occurs via email and notices in the school newsletter.

Issuing of Statements

A statement will be issued via email each week for all families showing the details for the statement period that has just occurred. The statement will include details of—

Sessions of care	• Daily and weekly totals of the number of hours of care provided during the statement period, including start and end times for each session of care. • Daily and weekly totals of the number of physical attendances during the statement period, including start and end times of the physical attendance. • The sum of allowable and additional absences for the statement period • The sum of allowable and additional absences cumulatively for the financial year.
Fees	• Hourly session fee for each session of care in the statement period. • Daily and weekly totals of the amount of all fees charged during the statement period. • Details about any discounts or refunds applied.
Fee reduction amounts	• Hourly session fee for each session of care in the statement period. • Daily and weekly totals of the amount of all fees charged during the statement period. • Details about any discounts or refunds applied.

Child Care Subsidy

The Service will provide relevant CCS information to support families to navigate the system and the relevant requirement for receiving entitlements. Notwithstanding the service's intent to provide information, it remains the responsibility of parents/guardians to be informed around their entitlements.

Parents/guardians may not receive CCS payment where—

- Allowable absences have been exhausted (although may be entitled to additional absences, subject to evidence),
- Session hours for the CCS fortnight have been exhausted,
- Fees are payable before the child's first attends or after the child's last day of physically attending the service (although there are exceptions).

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations:**
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.172 Notification of change to policies or procedures
- **National Quality Standard:**
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [A New Tax System \(Family Assistance Administration\) Act 1999](#)
- Department of Education - [Child Care Provider Handbook](#)
- [Competition and Consumer Act 2010 \(Cth\)](#)

Related Policies and Procedures

[7.5 Governance and Management](#)

[7.9 Budgeting, Procurement and Financial Planning](#)

[7.11 Child Care Subsidy \(CCS\) and Additional Child Care Subsidy \(ACCS\) Management and Compliance](#)

[7.11 Child Care Subsidy \(CCS\) and Additional Child Care Subsidy \(ACCS\) Management and Compliance](#)

[7.16 CCS Governance and Compliance](#)

Policy 7.10 Fees, Statements and Parent Gap Fee Payments		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V2-03.2025 – Change of name, added additional information to all roles and responsibilities and added families, added procedures relevant to public holidays/service closure and payment plans.		
V2-10.2025 – No updates		
V3-04.2026 – added procedures relevant to unexpected events		

7.11 Child Care Subsidy (CCS) and Additional Child Care Subsidy (ACCS) Management and Compliance

Policy Statement

The Service is committed to ensuring that Child Care Subsidy (CCS) and Additional Child Care Subsidy (ACCS) is administered effectively and in accordance with relevant legislation. The procedures supporting this policy describe the steps taken to ensure compliance with the service's obligations as an approved child care service for the purpose of administering CCS and ACCS. This includes reporting and the detection and prevention of fraud in relation to CCS and ACCS payments.

Additional Child Care Subsidy (ACCS)

Additional Child Care Subsidy provides a range of additional fee assistance to support vulnerable or disadvantaged families and children. This support recognises the preventative and protective influence of quality child care on a child's health, wellbeing and development, and the importance of continuity of care. It typically covers the full fees for child care and is paid directly to the Service. The ACCS (Child Wellbeing) payment aids with the cost of care for families who care for a child at risk of serious abuse or neglect. Unlike other subsidies, the service applies for the child wellbeing subsidy on behalf of a family. The Service commits to upholding the integrity of the CCS system through the application and management of ACCS (Child Wellbeing) payments.

Definitions

Fit and Proper Persons: It is a legal requirement that any person handling CCS funds must be competent, honest and of good character, law-abiding, free of conflict of interests and able to responsibly manage public money. Fit and Proper Persons must undertake suitability checks as per the requirements of Section 43 of the Child Care Subsidy Minister's Rules 2017, which apply to Approved Providers, Persons with Management or Control (PMCs) and key personnel.

Authorised person: means a person who has been identified by the service in writing as having permission to access the service's CCMS administration software and has been provided with a username and password to access the system. Access may include management of enrolments, bookings, absences and cancellations. The Approved Provider will ensure 'Authorised' persons are appropriately trained and competent in the use of the software

Roles and Responsibilities

Approved Provider	• Ensure the service fulfils its duties for assessment of fit and proper persons. • Ensure only authorised persons has access to the service CCS administration software • Ensure processes are in place to remain eligible for Approval (including conditions imposed by the Secretary in accordance with Family Assistance Law eligibility requirements. • Ensure the service fulfils its duties for assessment of fit and proper persons. • Maintain compliance with Family Assistance Law, Education and Care Services National Law 2010 and Education and Care Services National Regulations 2011 and any other applicable laws relating to operating a family day care service by remaining up to date through annual training and remaining informed of related legislation and best practice. • Delegate the Nominated Supervisor as the responsible person for the accuracy of data submitted in relation to the administration of Child Care Subsidy (CCS) through the service's CCMS software. • Accounting/financial records are reconciled by a registered Accountant at least annually

	- Conduct regular financial meetings with administration staff undertaking review of all reports for accuracy. Reports of suspected or substantiated fraud will be addressed as a matter of priority and immediate action taken - Identify potential situations where fraud can take place and implement a risk assessment using the risk matrix to develop strategies for minimisation or elimination of the risk.
Nominated Supervisor and Responsible Persons	- Monitor the day-to-day compliance of the services IT systems to ensure only authorised persons are accessing CCS software. - All persons undertaking data entry responsibilities in the service's Child Care Management System (CCMS) will undergo training provided through the CCMS software provider. Data entry will be monitored and supervised with additional training and information provided as needed. - Support families to access ACCS services as required. - Monitor and respond to 'at-risk' children to ensure access to ACCS (Child Wellbeing) as required.
Families	- Provide verification of children's immunisation status to access Child Care Subsidy entitlements. - Complete a Complying Written Arrangement (CWA) during the Service enrolment process and approve the Service through your MyGov account. - Comply with requirements of the Family Assistance Law for accuracy of children's attendance records. - Agree to the payment of gap fees through electronic funds transfer including payment of any amount required if Child Care Subsidy entitlements are not approved.

Key Tasks and Responsibilities

System governance	The Approved Provider will ensure the relevant protections and integrity measures are established to ensure the service is compliant with CCS requirements.
Administration and application management	The Nominated Supervisor is principally responsible for the administration of ACCS (child wellbeing) application and submitting relevant evidence on behalf of the service and families. They will be the key contact for family enquiries.
Record Keeping	The Nominated Supervisor will maintain the relevant records and supporting evidence on behalf of the service and ensure the procedures are followed.

Procedures

The Service will implement the following procedures to comply with the administration requirements of child care subsidy:

- Ensure that only **authorised persons** within the service have access to the service's licensed software for the administration of CCS
- Ensure that all staff who require access to the system used to administer CCS meet the fit and proper requirements
- Ensure that all committee members of the Approved Provider meet the **fit and proper** requirements
- Reconcile payments received with payments expected

The Service will implement procedures to detect and minimize fraud, including:

- Ensuring all "Persons with Management or Control of the Provider" (e.g. the Board Members and Managers), "Persons Responsible for the Day to Day Operation of the Service" (e.g. Nominated Supervisor, Responsible Person in Charge or Administrator of CCS) meet specified **fit and proper** requirements
- Ensuring all service finances are handled in accordance with service policy, accounting manuals and best practice guidelines

- Ensuring there is no personal 'conflict of interest' of staff or the governing body in the management of CCS
- Ensuring staff are appropriately trained in CCS compliance and the use of service software

Child Care Subsidy (CCS)

The Service are not directly involved in calculating a family's Child Care Subsidy (CCS) entitlements. This is a matter between the Family and Centrelink. Families will pay a co-contribution to their childcare fees and pay the gap fee (the difference between the fee charged and the eligible childcare subsidy amount). Under the Family Assistance Law, it is a legal requirement for families to pay their childcare fees via EFT as agreed in their Care Arrangement.

PLEASE NOTE: Parents must provide information that is true and complete when enrolling their child with the Service. Incorrect or missing information may result in the delay of CCS being applied by Centrelink resulting in the full fees for childcare being charged to the families account.

Additional Child Care Subsidy (Child Wellbeing)

Additional Child Care Subsidy (child wellbeing) provides additional child care fee assistance to an individual (or provider) for children at risk of serious abuse or neglect. It helps to address cost barriers families may experience so that children can either enter or remain engaged with child care.

The Service will maintain access to a current copy of the Department of Education - Child Care Provider Handbook to support in accessing relevant guidance on ACCS.

Identifying children eligible for ACCS (Child Wellbeing)

As a CCS Provider, the Service is centrally involved in identifying children who require extra support through ACCS (child wellbeing).

For this purpose, a child is considered to be at risk of serious abuse or neglect if the child is at risk of experiencing harm, as a result of current or past circumstances or events that resulted in the child being subject to, or exposed to, any of the following:

- Serious physical, emotional or psychological abuse, or
- Sexual abuse, or
- Domestic or family violence, or
- Neglect.

The Minister's Rule sets out in detail the circumstances when a child is taken to be at risk of serious abuse or neglect for the purposes of Additional Child Care Subsidy (child wellbeing). The definition of 'at risk' includes situations where the child is likely to experience those circumstances in the future (for example, the future risk is 'real and apparent'). This allows families to be eligible for the subsidy at the appropriate earliest point and potentially before they are known to a child protection agency.

Any child who is identified as being at risk under state or territory child protection law will meet the definition of at risk and the individual (or provider) will, therefore, be eligible to receive the payment.

Accessing ACCS (child wellbeing)

Where the Service has identified a child at risk, the first steps will be to apply for a certificate on behalf of the family. When applying for a ACCS certificate, the Nominated Supervisor will refer to the Child Care Provider Handbook for up-to-date instruction on the relevant steps.

In certain cases, the Service may identify a child at risk of neglect or abuse who meets relevant criteria but may be unable to identify a parent or carer eligible for Additional Child Care Subsidy (child wellbeing). In these cases, as a last resort, the Approved Provider may be eligible for Additional Child Care Subsidy (child wellbeing) under an eligible provider arrangement. The Service must monitor this arrangement and will end the ACCS once the child is no longer at risk or where an eligible individual is identified. Refer to the *Guide to Additional Child Care Subsidy (child wellbeing)* for further guidance.

PLEASE NOTE: all applications for ACCS will be approved by the Nominated Supervisor. Applications will need to include the required evidence to be considered.

Other Additional Child Care Subsidy (ACCS) Eligible Arrangements

ACCS (grandparent).

Grandparent carers need to apply directly to Centrelink for Additional Child Care Subsidy (grandparent).

- Providers are not directly involved in the application process but may wish to encourage families whose circumstances may make them eligible for Additional Child Care Subsidy (grandparent) to enquire with Centrelink.
- Providers will be notified if the Additional Child Care Subsidy (grandparent) payment is approved for a child enrolled in the service.

ACCS (temporary financial hardship)

Is designed to provide short-term support to families experiencing significant financial stress due to exceptional circumstances beyond their control.

- Where a family shares information about difficult circumstances impacting their ability to pay fees, which may fall into the circumstances listed above, the Service can encourage the family to contact Centrelink.
- The Service is not directly involved in the application process but will be notified if Additional Child Care Subsidy (temporary financial hardship) payment is approved for a child enrolled in the service.
- Centrelink may also be able to provide advice on other support and assistance based on the family's circumstances.

Additionally, on a case-by-case basis, the Approved Provider may consider written requests for support from families when the hardship does not meet the threshold for ACCS or Centrelink assistance, however, under Family Assistance Law the service is unable to waive the gap fee co-contribution.

Application of Child Care Subsidy (CCS)

Complying Written Arrangements (CWA)

A CWA is an arrangement between an Approved Provider (the Service and Educator) and an individual (parent), to provide child care in return for fees. It serves two main purposes:

- a child is taken to have commenced enrolment when an Approved Provider and individual (parent) enter into a CWA, and
- to be eligible for CCS for a session of care, an individual, or their partner, must have incurred a liability to pay for the session under a CWA.

The Service will have a CWA for a care arrangement with a parent for each child enrolled in care.

The CWA must include the requirements as per subsection 200B (3) of the Family Assistance Administration Act. An arrangement is a complying written arrangement where it expressly sets out, in writing, all of the following:

- a) The names and contact details of the parties to the arrangement,
- b) The date the arrangement was entered into,
- c) The name and date of birth of the child to whom sessions of care are proposed to be provided,
- d) Whether care will be provided on a routine basis under the arrangement, and if so:
 - i. details about the days on which sessions of care will usually be provided; and
 - ii. usual start and end times for these sessions of care.
- e) Whether care may be provided on a casual or flexible basis under the arrangement (either in addition to or instead of being provided on a routine basis).
- f) Details about fees proposed to be charged to the individual for the sessions of care provided under the arrangement - the fee schedule.

PLEASE NOTE - Paragraph 85BA(1)(b) of the Family Assistance Act provides that an individual is eligible for CCS where, among other requirements, the individual has incurred a liability to pay for a session of care under a complying written arrangement.

Such an arrangement must both comply with the requirements set out above and be stated in terms that clearly establish a liability to pay for sessions of care in order for an individual to be eligible for CCS for a session of care.

Enrolments

The Service will give priority of enrolment to children as per procedures listed in policy [6.1 Access for Families](#). A Complying Written Agreement of arrangements will be included as part of the enrolment process.

The Nominated Supervisor will manage any disputed enrolments (if received) by:

- Agreeing there was an error and re-submit enrolment with corrections,
- Contacting the family and resolving the disagreement prior to resubmission,
- Where relevant, ensuring the family can continue to access care until resolved,
- Noting the enrolment outcome on the family's record (include casual and routine arrangements),

The Nominated Supervisor will ensure enrolments are updated in writing (within seven days) if:

- There is a disagreement in enrolment,
- Enrolment has varied due to change in circumstances,
- Information provided to the Service is incorrect or becomes outdated,
- An arrangement of care ceases,
- The child has been absent for more than fourteen (14) weeks.

Where a child has been absent for more than 14 weeks, re-enrolment is required through the completion of an agreement (CWA) and enrolment documentation or in writing (refer to 14-week Rule below).

Booked hours

Bookings are divided into two categories – school term bookings and vacation care bookings.

- School term bookings are ongoing throughout the terms only, including public holidays.
- Vacation care bookings are separate from term bookings.

The dates and hours of care are required to be noted on the Complying Written Arrangement.

14-week Rule

Where a child does not attend any session of care with the Service within a period of 14 weeks or more, Centrelink takes the enrolment to have ceased. If a child is going on 14 weeks or a longer holiday, the enrolment will be ended, and fees CANNOT be charged to hold the place.

The Service will:

- Keep a register that records the last CCS payment if this was an absence (see below - first/last day of care absence) and track the period between the time they were last in care.
- Draft a letter when this reaches 8 weeks, outlining the CCS requirement and the fee owed to the Service if the child doesn't return within 14 weeks due to not meeting the eligibility of CCS. This is repeated at 10 weeks and again at 12 weeks.
- Invoice the family at 14 weeks, to recover the cost of any outstanding CCS.

Absences

When a child is absent from care for a booked session (whether the reason is sickness or holidays), the Service must be notified, and normal fees will apply. Parents will notify the Service of an absence as per procedures set out in policy [6.3 Bookings and Cancellations](#).

Child Care Subsidy is paid on up to 42 absence days in a financial year including public holidays and sick days. Once a child has exceeded 42 funded absence days in the financial year, a full fee charge applies if no supporting documentation is provided for the absent day. (i.e., CCS will not reduce the cost of care for the day). Before this is applied, the Nominated Supervisor will assess and, if deemed appropriate, approve the additional absences before the absence is reported. There is no limit on the number of additional absence days a recipient may claim, providing the absence days are taken for specified reasons and supporting documentation, where required, is provided.

Supporting documentation includes:

- Illness – a medical certificate for the child or any relative living in the child's household

- Rostered days off (RDO) or rotating shift – a written statement by the employer on company letterhead
- Periods of local emergency – a statutory declaration signed by the parent, unless the government recognised the local emergency
- Court ordered shared custody – copies of legal documents

In shared care arrangements (where separated parents both claim CCS for the child's care), the allocation of 42 absence days relates to the child, not to each individual claimant.

First/Last Day of Care Absences

CCS will not be paid until the child physically attends their first session of care, unless they meet specific circumstances when absences can be reported. For example, a child is booked for Monday but does not come into care for the first day until Tuesday. In that case, CCS will only apply from Tuesday (unless they meet the specific circumstances when absences can be reported).

CCS will only be payable up to the child's last physical session of care. Any absences after that, even if they are booked days, will not be eligible for CCS and the parents will be charged the full cost of care.

Where an absence has been recorded for a child and then no attendances are submitted for that child for 14 weeks, Centrelink will automatically cancel the child's enrolment and any Child Care Subsidy paid for absences will be recovered from the family's account, with the potential of creating a debt.

Specific Circumstances When Absences Can Be Reported

Families can receive CCS for absences for a session the child was expected to attend that occur up to seven (7) days before a child's first, or after a child's last, physical attendance at a service, for any of the following reasons:

- Any of the additional absence reasons,
- The child, the individual who cares for the child, the individual's partner or another person with whom the child lives is ill (no medical certificate required if the child has not used 42 absence days),
- The Service has changed ownership,
- The usual Service is closed, and the child is attending a different service under the same provider,
- A family tragedy (a major event including the death of an immediate family member) has occurred, or the enrolment ceased incorrectly.

In all the above, evidence of the reason for the absence will be documented and additional evidence provided if specific circumstances apply and will be kept on the child's file.

Local Emergency

In the event of a local emergency being called, no care and education will be provided by the Service where it has been identified as being at increased risk in the declared area. Children who have a permanent booking for a day/session which has been declared as a local emergency will be charged as an absence, and the normal fee will be payable.

Age Restrictions and Exceptions

Generally, children aged 13 and under who do not attend secondary school are eligible for CCS. There are exceptions where older children as per Sections 8B, 8C, 8D of the Minister's Rules may be eligible for CCS. The Nominated Supervisor must refer to the Rules and follow due process if a family is seeking to enrol a child aged over 13 and attending secondary school.

Transport Only

Section 8 of the Minister's Rules provides that there is no eligibility for CCS where the care is provided aboard a transportation vehicle (such as a bus) unless the transport is merely incidental to a session of care being provided (such as to take children on an excursion/regular outing).

Cancellation of Care

Cancellation of care by any party requires two weeks' notice in writing. The child must attend the last day of care for CCS to be applied. It is at the discretion of the Nominated Supervisor to override the two weeks' notice if it is deemed to not be in the best interests of all stakeholders.

This written notice (or email) must be provided to the Nominated Supervisor on or before the child's last day of care. The child and family details will be removed from the CCMS system no less than ten working days after the last week ending of care.

Administration of Child Care Subsidy (CCS)

Child Care Subsidy cannot be paid until a session report is received. A session report must be submitted for each child for each week a session of care has been provided (including absences). It must contain at least one session of care for a week, recorded as either an attendance or absence. It must only include sessions of care for which an individual incurred a genuine fee liability. CCS is calculated on the booked session hours of care.

It is vital that the Service submits accurate session reports on time as this enables the correct calculations of the amount of CCS or ACCS (if any) that is payable for care provided to a child. If the Department of Human Services has concerns about the accuracy of session reports, it can stop processing payments until the information has been verified. Session reports must be submitted within 14 days after the end of the week when the sessions were provided, except in circumstances as specified in the *Child Care Provider Handbook*.

Inaccurate reports can result in incorrect CCS and ACCS and affect the eligible individuals and children to whom the care relates. Further, under Family Assistance Law, a person may commit an offence and is liable for a civil penalty if a session report is not submitted within the required timeframe and containing the required information, including information needed to determine whether an individual is eligible for, or entitled to be paid CCS or ACCS and, if so, the amount.

If a session has been submitted incorrectly it can be varied or withdrawn within 28 days. For any adjustments made to sessions after 28 days a reason for resubmitting must also be submitted.

CCS Payments Made Directly to Families

There may be circumstances where CCS is paid to families instead of the service.

In situations where sessions have been submitted before the parent is approved for CCS, backdated amounts may be paid directly to the parent once Centrelink confirms their eligibility. Payments made directly to families may also occur if there has been a change in circumstances which affect the family's CCS entitlement.

Where the parent/guardian has been paid the Child Care Subsidy amount directly, there will be no CCS applied and their account will be charged full fees for the relevant attendances.

Complaints Relating to the Administration of Child Care Subsidy

Families who wish to raise concerns regarding the management of accounts and Child Care Subsidy should speak with the Nominated Supervisor in the first instance who will follow procedures as outlined in the Service's complaints management policy, including advising the Approved Provider of all grievances.

Families can raise concerns regarding management of the Child Care Subsidy to the dedicated Child Care Tip-Off Line either via phone or email:

- Phone: 1800 664 231
- Email: tipoffline@education.gov.au

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership.

Additional Regulatory Context and Guidance

- [A New Tax System \(Family Assistance Administration\) Act 1999](#)
- Department of Education - [Child Care Provider Handbook](#)

Related policies and Procedures

[7.1 Nominated Supervisor](#)

[7.2 Determining the Responsible Person](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.5 Governance and Management](#)

[7.9 Budgeting, Procurement and Financial Planning](#)

[7.10 Fees, Statements and Parent Gap Fee Payments](#)

[7.16 CCS Governance and Compliance](#)

Policy 7.11 Child Care Subsidy (CCS) and Additional Child Care Subsidy (ACCS) Management and Compliance		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V1-03.2025 – No updates		
V1-10.2025 – No updates		
V2-04.2026 – Updated policy statement, added definitions, added families and enhanced roles and responsibilities, added procedures relevant to CCS, ACCS entitlements, application of CCS, administration of CCS		

7.12 Workplace Health and Safety

Policy Statement

For the protection of children, educators, management and the service as a whole, the Service will ensure that its equipment, facilities and premises are safe and clean in keeping with the requirements of the Work Health and Safety Act, 2011. The Service promotes health and safety awareness for all people involved in the service, embedding a culture of safety and wellbeing as a primary goal. Policies and procedures are developed and monitored to reflect safe work practices and to align with current child safety regulatory requirements.

The Service will ensure the space and facilities used for the OSHC program are safe, stimulating and enable the provision of quality education and care. We will work collaboratively to ensure the environment is physically, emotionally, and culturally safe and accessible for all children and will positively and safely contribute to their wellbeing, learning and development. The Service recognises the responsibility to ensure the environment and equipment used in providing care and education is safe, clean and in good repair.

Risk Assessment Consultation

Consultation with educators is more than a courtesy, it is a legal requirement and an essential part of managing health and safety risks, including those that impact child safety and wellbeing. A safe workplace is more easily achieved when everyone involved in the work communicates with each other to identify hazards and risks, talks about any health and safety concerns and works together to find solutions. This includes cooperation between the people who manage the work and those who carry out the work or who are affected by the work. By drawing on the knowledge and experience of everyone, more informed decisions can be made about how the work should be carried out safely and how the environment can be made more secure for everyone. Educators are to be actively involved in the risk assessment process to improve the effectiveness of controls and to drive a culture of safety, trust, and openness.

WHS Procedures

The Service's duties in maintaining a suitable safe and healthy workplace environment is covered by procedures for—

- managing risks in the workplace with a specific focus on identifying and mitigating risks to safety and wellbeing (risk assessment process),
- systems to ensure a safe physical environment is established and maintained, and this includes ensuring the environment is culturally safe and free from all forms of harm
- routine practices to manage workplace hazards including psychosocial hazards that can impact a work-safe culture.

Roles and Responsibilities

Approved Provider	• Exercise due diligence to eliminate or minimise health and safety risk so far as it is reasonably practicable. • ensure the service has and uses appropriate resources and processes to eliminate or minimise risks to health and safety. • Consult with workers who are directly affected by a health and safety matter so far as it is reasonably practicable. • Establish a comprehensive orientation and induction process for staff that includes guidance and instruction on identifying hazards and risk management.
Nominated Supervisor	• Implement a comprehensive orientation and induction process that includes guidance and instruction on identifying hazards and managing risk. • Lead the risk management procedures for the service. • Consult and collaborate on risk management activities with educators, children and families and those who will be directly affected.

	• Monitor controls to ensure they are working as planned, undertake a review of the risk management processes when needed and ensure all controls contribute positively to a work-safe culture. • Maintain relevant registers as required e.g. chemical register, SDS, etc.
All Staff	• Take reasonable care for their own health and safety and do not adversely affect the health and safety of other persons. • Comply with any reasonable instruction and co-operate with any reasonable health and safety policy or procedure. • Utilise the relevant PPE when necessary. • Collaborate with the Nominated Supervisor on identifying hazards, risk assessment and management planning and delivery.

Key Tasks and Responsibilities

Risk Assessment Procedures	The Approved Provider is responsible for establishing processes to manage and control risks. They collaborate with the Nominated Supervisor and educators to ensure effective control measures are embedded. The Nominated Supervisor is responsible for maintaining risk assessment records and relevant reports.
Daily Checklists	All educators are to inspect the physical environment to ensure the service is physically suitable for play and leisure. Any identified hazards are brought to the attention of the Nominated Supervisor or Responsible Person and addressed appropriately. This includes checking that all equipment and spaces are culturally safe and affirming.
Supervising Practices	The Nominated Supervisor or Responsible Person is responsible for the supervision of staff executing tasks to ensure safety, including providing relevant instruction and guidance. This supervision will also ensure that interactions between staff are respectful, culturally safe, and promote employee wellbeing.

Procedures

Work Health and Safety - Risk Management Process

While the Approved Provider sets out the expectations and processes for ensuring risks are managed, the Nominated Supervisor is responsible for leading the day-to-day work health and safety management and to ensure control measures are followed. In recognising risk management is a shared responsibility, the Nominated Supervisor is supported by educators who will assist identifying hazards and improving the control measures adopted to address relevant risks. This includes the identification of all potential risks including physical, psychological and cultural.

The Educator Handbook and orientation/induction processes contain up-to-date information on the legislative requirements for workplace health along with information about the relevant policy and procedure. The Nominated Supervisor shall ensure that each person has adequate time, education/training and resources to ensure that they understand their and are able to fulfill their role as required by the legislation.

A comprehensive risk assessment process forms the basis of the work health and safety framework for the Service. This process extends beyond physical safety to encompass the psychosocial and cultural safety of employees. Our risk assessment procedures are ongoing process that are triggered when there is a change or introduction to anything that might affect work activities, the environment or the health and safety of people at the Service. Training materials and strategies shall be made available and accessible to help employees, volunteers and parents/guardians identify and manage risks of harm.

The Nominated Supervisor will consider a new or revised risk assessment when:

- Changing work practices, procedures or the work environment,
- Purchasing new equipment or using new substances,

- New information about work related risks becomes available,
- Responding to work related incidents (even if they have caused no injury),
- Responding to concerns raised by workers or others at work,
- Required by the relevant regulation or rule or when a new employee joins the service with specific cultural needs or a background of trauma.

Managing workplace risks is a four-stage process to:

Identify hazards	Discover and document what could cause harm, including identifying any practices or environments that may not be culturally safe.
Assess risks	Understand- • the nature of the harm that could be caused by the hazard, • how serious the harm could be, and • the likelihood of it happening.
Control risks	Implement the most effective control measure that is reasonably practicable in the circumstances.
Review control measures	Monitor and supervise control measures to ensure they are eliminating or isolating risks as planned and gather feedback from employees, children and families to ensure the controls are effective and culturally appropriate.

Once a hazard is identified, the risk assessment process will identify a control measure that takes every reasonable precaution to control the risk, with the hierarchy of risk control informing the control measure selected. The service will look to adopt the highest level of control available—

Level 1	Eliminate	Remove the hazard and associated risk.
Level 2	Substitute	The hazard with something safer - replace hazard item.
	Isolate	Physically separating the source of harm from people by distance or using barriers.
	Physical modification or design	Uses a mechanical device or process to physically assist and reduce the chance of physical injury or fatigue.
Level 3	Administrative controls	Work methods or procedures that are designed to minimise exposure to a hazard.
	Personal protective equipment (PPE)	Face masks, gloves, aprons and protective eyewear.

Consultation

Educators will be actively involved in ensuring a safe and healthy work environment, being provided with a reasonable opportunity to express their views and contribute to health and safety decisions. This may involve:

- providing a suitable time during work hours for consultation and discussion.
- allowing opinions and perspectives about health and safety to be regularly discussed and considered in meetings.
- providing educators and parents/guardians with multiple ways to provide feedback (e.g. email).

The Approved Provider and Nominated Supervisor will take into account the views of educators and families before making final decisions. However, consultation will not require consensus or agreement, it's purpose is around the service's leadership to allow contribution for stakeholders before health and safety decisions made.

Safe Physical Environment

The general design of the facilities is appropriate for quality education and care, and ensures there is adequate temperature control, ventilation, lighting and shade for children and educators' health, safety and comfort. All facilities will be designed and maintained to be culturally safe and inclusive for all employees, children and families.

Risk Assessment

The Service has developed a comprehensive risk assessment for the service's indoor and outdoor environment, which establishes a standard for the environment's health and safety. This includes an assessment of potential risks related to child safety, such as access points, supervision blind spots, and the security of the premises.

Daily Inspections (Checklists)

Prior to each session an inspection of the facilities is carried out (daily safety checklists) to ensure the environment reflects the established standard. This inspection will also include a check for items that might be culturally inappropriate or offensive. Sandpits will be raked prior to use to check for any animal faeces and any potentially dangerous objects.

These checks are documented, and any issues are brought to the attention of the Nominated Supervisor, with the following remediate actions expected—

- Any equipment that is faulty or broken is removed and/or disposed of.
- Any rubbish or hazards are cleaned, or where this isn't possible, the area is isolated.
- Any playground features that are damaged or worn will be isolated and reported to the school for maintenance.

Where an area is isolated because of a hazard-

1. An entry detailing the problem will be entered into the team communication book and Educators will be informed at the daily meeting/catch up, and
2. A hazard report form will be completed and the school will be notified at the earliest opportunity.

Electrical Safety

The Approved Provider will ensure the building is inspected periodically for electrical safety including relevant electrical safety devices. The Nominated Supervisor will coordinate and ensure:

- Specified electrical equipment is inspected, tested and tagged by a competent person at recommended intervals and immediately withdrawn from use if it is not safe to use.
- Specified electrical equipment is connected to a type 1 or 2 safety switch. The safety switch must be tested at prescribed intervals and withdrawn from use if not working properly.

Educators will be instructed in the safe use and storage of electrical equipment associated with their work.

Fire Safety

The Approved Provider will ensure all fire safety equipment (extinguishers and blankets) are maintained in accordance with the *Building Fire Safety Regulation 2008* and the Nominated supervisor will ensure all fire extinguishers and blankets are tagged and tested on a regular basis.

Emergency evacuation pathways will be prominently displayed at each exit to the OSHC premises and other indoor areas the Service use.

The Nominated supervisor will schedule regular training for educators relevant to fire safety procedures at the Service.

Managing Workplace Hazards (Routine Practices)

Hazardous Materials and Chemicals

Hazardous materials are defined as any chemical, substance or material that can cause potential harm, injury or illness to persons or damage to the OSHC environment. The Service promotes the use of environmentally friendly products where possible and ensure we provide a safe environment where

chemicals and hazardous products and equipment are safely stored and managed away from children and are handled appropriately.

A risk assessment has been developed in consultation with all Educators to address the storage and use of any dangerous or hazardous substances (chemicals, disinfectants, sanitisers, poisons, corrosive or otherwise toxic substances) located at the service, and ensures—

- All potential hazardous substances, including cleaning items, are to be—
 - clearly labelled as per manufacturer safety instructions.
 - kept out of reach of children and placed in a child proof storage facility.
- Any unlabelled, unused or unnecessary substances are disposed of in a safe manner.
- All substances stored at the service have a safety data sheet (obtained from the manufacturer) and are retained in the SDS register which is readily available and regularly updated.
- Personal Protective Equipment (PPE) is provided for use, where necessary.
- Educators will be trained and instructed on the safe use and storage of any relevant substances including ensuring all chemicals and cleaning products are returned to their designated location immediately upon completion of cleaning tasks.

The Service will ensure relevant signage is displayed highlighting the hazardous nature of chemicals used or stored (e.g., Caution- Chemical Storage Area; Danger; Hazardous Chemicals).

Environment Risks and Management

The Nominated Supervisor will be responsible to ensure that the Service has adequate heating, ventilation and lighting at all times. The Nominated Supervisor will ensure that educators remove all equipment that is faulty or broken.

Prior to use each day, educators will conduct a documented safety check of all indoor and outdoor spaces and equipment to ensure it is safe for use and free from hazards that may cause harm to children or staff. Hazards identified from daily safety checklists will be brought to the Nominated Supervisor's attention by the educator. The Nominated Supervisor will take the appropriate steps and record the event in a hazard report form and forward it to the relevant persons (such as the Approved Provider).

Facilities and equipment assessed to have potential for injury will not be used or action is taken to allow for safe usage. An entry detailing the problem will be entered into the team communication book and all educators will be instructed on any restrictions necessary on use of equipment or areas.

Manual Handling

The Service will ensure that all team members have adequate training in relation to safe lifting and manual handling techniques used at the service. Educators must use lifting equipment (e.g. hoist, devices with wheels) as advised by management for use.

The Nominated Supervisor will ensure that appropriate lifting and manual handling techniques are practised by educators and/or volunteers. Educators must inform the Nominated Supervisor if they have any medical or health issues that may place them at risk of injury when lifting or moving people/objects.

Information regarding appropriate lifting and manual handling techniques will be made accessible to educators through the orientation and induction process, and through ongoing displays of safe techniques.

Should lifting equipment (e.g. hoists) be required, relevant training and instruction will be provided. These resources should only be used as intended.

Disposing of Sharps or Other Dangerous Objects

'Sharps' refers to any object that can pierce or penetrate the skin easily, including needles and/or broken glass. An injury from a needle-stick can expose a person to blood-borne viruses.

Where a needle/sharp hazard (including broken glass that may be contaminated with blood) are found on the premises, the safe disposal procedures will be carried out by an educator or responsible person—

1. Move children away from the area.
2. Ensure there is space to move and clearly observe the sharp.
3. Put on disposable latex or vinyl gloves that do not interfere with dexterity.

4. Grabbers or other implements should not be used. A stick may be used to carefully separating multiple sharps.
5. Bring the sharps container to the syringe, placing it on an even surface beside the object (syringe/sharp)
6. Use gloved hand to pick up the syringe by the middle of the barrel. Do not use a brush to sweep the syringe, as the sweeping action can cause the object to flick into the air causing additional risk.
7. Place the syringe in the container sharp end first.
8. Securely place the lid on the container and ensure it is sealed. Hold the container by the top when carrying.
9. Dispose of the container by putting in an industrial bin or taking it to a public sharps disposal bin. Ensure it is stored appropriately while in transit.

If an educator is injured by a used needle:

- Wash with running water and soap as soon as possible.
- Apply a sterile waterproof dressing.
- Seek medical advice.
- Follow the safe disposal procedures as above and take the needle or syringe with you to the doctor.

A sharps container is available at the service and is a receptacle intended for the collection and disposal of sharps. It is—

- Rigid-walled, puncture-proof, and sealable,
- Yellow in colour,
- Labelled as 'sharps' or 'infectious waste', and
- Carries the biohazard and AS/NZS symbols.

Biological Hazards

The Service has relevant protocol and procedures for addressing biological hazards such as bodily fluids (e.g. urine, blood, etc). These are set out in policy [2.8 Hygiene, Health and Wellbeing Practices](#).

Psychosocial Hazards

The Approved Provider, so far as is reasonably practicable, must ensure educators and other persons are not exposed to risks to their psychological or physical health and safety and must eliminate psychosocial risks in the workplace, or if that is not reasonably practicable, minimise these risks so far as is reasonably practicable.

Psychosocial hazards that may arise include:

- work-related stress due to:
 - job demands,
 - poor support,
 - lack of role clarity,
 - poor organisational change management,
 - inadequate reward and recognition.
- Bullying.
- Violence and aggression.
- Harassment including sexual harassment.
- Conflict or poor workplace relationships and interactions.

Stress itself is not an injury but if it becomes frequent, prolonged or severe it can cause psychological and physical harm. Psychological harm or injuries from psychosocial hazards include conditions such as anxiety, depression, post-traumatic stress disorder (PTSD) and sleep disorders. Physical injuries from psychosocial hazards include musculoskeletal injury, chronic disease, and physical injury following fatigue-related workplace incidents.

In addressing these risks, the Approved Provider will ensure a risk management process is conducted, consistent with procedures listed within this policy, to ensure the Service maintains a supportive environment for its staff, children and families.

The protection of children, and the promotion of their safety and wellbeing is covered by many practices outlined in the relevant policies within Policy Group 2.

Expectations of conduct are clearly contained within relevant policy, including the service's code of conduct ([4.6 Code of Conduct](#) and [5.1 Interactions and Relationships with Children](#)). At all times interactions between workers will be expected to be respectful, courteous and professional.

Instances of harassment and bullying will be taken seriously. Employees have access to complaints mechanisms to support their access to a fair and reasonable workplace environment. Any workplace issues can be addressed to the Nominated Supervisor or the Service free of reprisal or victimization.

Employee's will be fairly managed and have opportunities to address performance and workload issues in appropriate forums, including regular performance review meetings and plans.

Managing Workplace Incidents

Under the Work Health and Safety Act (2011) legislation, all businesses are mandated to immediately notify WorkSafe QLD, if a notifiable incident occurs. If the regulator stipulates, the incident site must be preserved until an inspector arrives or directs otherwise.

Although there is no specific requirement stipulated in the National Law and National Regulations for reporting an incident involving a staff member, the Approved Provider must notify the state regulatory body if any circumstance arises at the service that may pose a risk to the health, safety or wellbeing of a child or children attending the service [Section 174(2) (a) and Regulation 176 (2) (a)].

Any incident involving a staff member will be managed in accordance with procedures set out in policies [2.4 Incident, Injury, Trauma and Illness](#) and [2.5 Administration of First Aid](#) and reported to the Regulatory Authority where necessary as set out in policy [7.7 Managing Notifications](#).

The Approved Provider will contact WorkSafe QLD and provide all relevant notifications and comply with all instructions and directions.

The Service will be sensitive and mindful of the impact that incidents involving staff members may have on all stakeholders and will engage health professionals to provide information, guidance and support for staff, educators, children and families when necessary, to ensure all parties are appropriately supported after an incident.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.155 Interactions with children
 - R.156 Relationships in groups
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA7 – Governance and Leadership

Additional Regulatory Context and Guidance

- [Work Health Safety Act 2011 \(Qld\)](#)
- [Department of Education Queensland - Safe handling and disposal of needles and syringes](#)
- Workplace Health Safety Queensland Codes of Practice:
 - [How to manage work health and safety risks](#)
 - [Work health and safety consultation, cooperation and coordination](#)
 - [Managing the risk of psychosocial hazards at work](#)
 - [Managing risks of hazardous chemicals in the workplace](#)

- [Preparation of safety data sheets for hazardous chemicals](#)
- [National Principles for Child Safe Organisations](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

- [2.1 Providing a Child Safe Environment](#)
- [2.2 Supervision and Educator Ratios](#)
- [2.3 Safe Arrivals and Departures of Children](#)
- [2.4 Incident, Injury, Trauma and Illness](#)
- [2.5 Administration of First Aid](#)
- [2.6 Water Safety](#)
- [2.7 Infectious Diseases](#)
- [2.8 Hygiene, Health and Wellbeing Practices](#)
- [2.9 Medical Conditions in Children](#)
- [2.10 Administration of Medication](#)
- [2.11 Sun Safety](#)
- [2.12 Safe Food Handling, Preparation and Storage \(Food Safety Program\)](#)
- [2.13 Emergency Evacuation, Lockdown and Drills](#)
- [2.14 Child Protection and Mandatory Reporting](#)
- [4.6 Code of Conduct](#)
- [4.9 Fitness for Work](#)
- [4.10 Managing Employee Underperformance and Misconduct](#)
- [4.11 Prevention of Workplace Bullying, Discrimination and Harassment including Sexual Harassment](#)
- [7.5 Governance and Management](#)
- [7.6 Privacy and Confidentiality of Records](#)

Forms and Resources

- [Indoor Safety Checklist](#)
- [Outdoor Safety Checklist](#)

Policy 7.12 Workplace Health and Safety		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V2-06.2024 – Additional procedures relevant to fire safety, types of psychosocial hazards and requirements for risk management process		
V3-03.2025 – Policy renumbered, added additional information to NS and Staff roles and responsibilities, added procedures relevant to hazardous materials and chemicals and managing workplace incidents.		
V4-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards.		
V5-04.2026 – enhanced roles and responsibilities, removed duplicated procedures relevant to hazardous materials and chemicals and references to Fair Work right to disconnect laws, removed National Laws not relevant.		

7.13 Service Closure

Policy Statement

The Service acknowledges that there may be times when the service is required to close due to both planned and unforeseen circumstances and recognises that effective communication and management procedures must be established to meet family expectations, provider requirements and to uphold the safety and care for children.

The Approved Provider recognises the obligation to comply with *Family Assistance Law, Education and Care Service National Law Section 174* and *Education and Care Services National Regulation 175* in notifying the Regulatory Authority of service closures, placing the protection of children at the centre of all closure decisions.

Roles and Responsibilities

Approved Provider	• Ensure the safety and protection of stakeholders accessing the service, with child safety and wellbeing as the highest priority. • Ensure stakeholders (including government bodies) are suitably notified of any closures, disruptions due to emergency events, or another time the service cannot operate, providing clear, timely, and culturally sensitive communication.
Nominated Supervisor	• Ensure the service is able to fulfil its duty to protect from harm. Where extreme and emergency events hinder the ability to care for children, ensure the safety and protection of children through sound management of service closure prioritising their physical and emotional security. • Deliver sound professional judgement and provide accurate information to the Approved Provider in consulting service closures with a focus on risk assessment and mitigation for children. • Ensure communication with families and stakeholders adequately notifies of service closure and other relevant requirements providing clear information about the reasons for the closure and any support available to families.

Procedures

The Service will operate as per the approved and advertised opening hours for each session of care where Child Care Subsidy is claimed unless there is an appropriate reason (i.e. emergency closure) and notification is given to:

- the Regulatory Authority (Queensland Government Department of Education - Early Childhood Education and Care); and
- the Australian Government Department of Education.

The Service will not close early due to children being collected prior to the approved and advertised closing time unless prior approval has been granted by the Regulatory Authority (Department of Education - Early Childhood and Community Engagement) and the Australian Government Department of Education and Training.

Unexpected or Emergency Closure

Closure of the Service may occur where there is an unexpected closure of the school or in any of the following instances:

- Extreme weather conditions, where remaining at the service poses a direct risk of physical harm to children and staff,
- Health concerns (e.g. outbreaks of contagious disease),
- Surrounding roads and access conditions, whereby families may be unable to collect children,
- Security concerns that pose a threat to the safety of the children and staff,

- Emergency situation, such as fire or other external threat that compromises the safety of the children and staff,
- Loss of power and/or water which prevents the service from meeting its obligations for child safety and hygiene.

The decision to close and re-open the Service will be made in consultation with the Approved Provider and/or emergency services personnel, if relevant, with the overriding priority of ensuring the safety and wellbeing of all children in care. The Approved Provider will notify the Regulatory Authority and Australian Government in accordance with policy [7.7 Managing Notifications](#).

The Nominated Supervisor will ensure the safety of all children and educators involved during the emergency, including providing a secure location if a full evacuation is necessary.

Once provisions have been made for the children's safety and wellbeing during the declared emergency, Educators/staff members will be able to attend to their personal safety and wellbeing needs. Educators/staff members may be able to leave the service early to get home if their route home is going to be affected by the emergency.

The Approved Provider will ensure workplace entitlements and obligations information is provided to Educators/staff members affected by the emergency closure.

Parent/Guardian Communication

In the case of immediate closure of the service, the Nominated Supervisor will contact families immediately to ensure the safe and timely collection of children from the service following pre-established emergency protocols. If families are unable to collect their children, alternative arrangements should be made with emergency contacts.

In the case of planned (or upcoming) closure, the Nominated Supervisor will:

- Communicate with families as soon as reasonably practicable, using clear and accessible language and methods that are culturally appropriate.
- Provide information for the reason for closure emphasising that the decision was made to ensure the safety and wellbeing of the children, and where possible,
- Provide anticipated timelines to the disruption, acknowledging the impact on families and offering any available support.

Refer policy [7.10 Fees, Statements and Parent Gap Fee Payments](#) for information regarding fees for periods of service closure.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.174 Offence to fail to notify certain information to Regulatory Authority
- **Education and Care Services National Regulations:**
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.175 Prescribed information to be notified to Regulatory Authority
- **National Quality Standard:**
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [Family Assistance Law](#)

Related Policies and Procedures

[2.1 Providing a Child Safe Environment](#)

[7.1 Nominated Supervisor](#)

[7.2 Determining the Responsible Person](#)

[7.5 Governance and Management](#)

[7.6 Privacy and Confidentiality of Records](#)

Policy 7.13 Service Closure		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V1-03.2025 – No updates, policy renumbered		
V2-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards		
V3-04.2026 – enhanced procedures related to unexpected or emergency closure		

7.14 Social Media and ITC Usage for the Service

Policy Statement

The Approved Provider recognises the importance of safe physical and online environments to promote the safety and wellbeing of all children. As set out in the National Principles for Child Safe Organisations and Queensland Child Safe Standards, the Service has the responsibility to ensure children and educators are protected from harm when they engage with digital technology, including social media.

The Service acknowledges a key role technology plays in the community and business, especially as a tool for communication. Therefore, the Approved Provider will support the effective and safe use of technology through suitable policies and procedures to ensure devices and tools are used appropriately and in the best interests of children, families and employees, upholding their right to privacy and cultural safety.

The Service recognises that their IT equipment is a critical resource in managing the privacy and confidentiality of business, family and employee information. The service is committed to ensuring the management and use of equipment upholds the obligation and commitment to information handling, particularly sensitive information about children and families. Likewise, the service understands that social media networking and other online communication platforms are an effective method for communicating with families who use the service. In doing so, the Service is committed to ensuring and promoting safe, respectful, and positive communications that protect children from harm.

The established guidelines, policies and procedures for:

- the administration of the OSHC social media pages/sites with the intention to ensure communication is respectful, ethical and is consistent with the purpose of community engagement principles while strictly adhering to the National Model Code for taking images and video of children.
- supporting the interaction and relationship of stakeholders and employees of the service to uphold a culture of safety and protection at all times.

Employees will be guided on expectation for the use of communication mediums (i.e. social media platforms) that could interfere with their employment and obligations and an employee. The service acknowledges that employees may access social networking sites (such as Facebook, Twitter, Instagram, etc.) to interact with friends, colleagues, and the community. This policy aims to establish guidelines on the access and usage of online social networking, with the aim upholding safety, protection and reputation for the service and its stakeholders with a clear focus on the safety of children.

For the purposes of this policy 'social media' and online communication will refer to any online tool, functions or platform that allow people to communicate via the internet. This includes, but is not limited to, applications such as:

- Social networking sites (e.g. Facebook, Pinterest, LinkedIn, Instagram)
- Video and photo sharing (e.g. YouTube)
- Music/dance videos (e.g. Tik Tok)
- Messaging platforms (Snapchat, Messenger)
- Blogging sites, forum or discussion boards (e.g. Twitter, Reddit)
- Online gaming

Roles and Responsibilities

Approved Provider	• Obtain written and informed consent from a child's parents/guardians prior to posting any comment or photos of their child on the service's social media in line with the National Model Code for taking images and video of children. • Provide guidance and expectations on the use of technology, devices and social media etc. to support the safety and protection of children, families, employees and the business reputation, actively fostering a child-safe culture online and offline.

	• Promote and support a child safe environment that is free from digital harm. • Prioritise safeguarding children and notify/report any inappropriate interaction with a child or children in our care.
Nominated Supervisor	• Respond and communicate instances of non-compliance, especially those that pose a risk to a child's safety or privacy. • Ensure the service's equipment and practices reflect the obligation of confidentiality and privacy owed to stakeholders, particularly for children's sensitive information, including their cultural background. • Promote supportive workplace cultures including collaboration with other Educators to ensure the safety and wellbeing of all children. • Set high expectations for Educator conduct and support their wellbeing where required, ensuring all staff understand their role in maintaining an online and offline child-safe environment.
All Staff	• Uphold the service expectations for appropriate communication through use of social media or other communication platforms, recognising their duty of care to children even in their personal time. • Ensure children are provided with suitable supervision to support the expectations of the service social media and ITC policy. • Be aware that any circumstances of social media misconduct may result in termination of employment, up to and including termination of employment where a child's safety has been compromised. • Step in to protect children whenever you see harmful content being screened, either by the service or individual children on their own personal device and immediately report it to the Nominated Supervisor.

Procedures

Infrastructure and Technology

Sufficient and suitable equipment is available for educators to complete relevant tasks, such as programming and documentation.

To protect the privacy and safety of children and families Educators are not to use personal devices for any documents or material that may contain the personal information, this includes—

- a) Taking pictures of children or families on personal phones.
- b) Writing observations on personal devices.
- c) Emailing/messaging parents/guardians from personal accounts.

To remove any doubt, personal devices may be used for work activities that do not store or save children and families personal information, for example—

- Attending a webinar.
- Researching programming ideas.
- Communicating staffing arrangements.

Where an educator believes additional equipment is needed, they should communicate this to the Nominated Supervisor.

Communication and Information Sharing with Families

Child Care Software

The Service upholds requirements for privacy and data by using reputable child care software to collect and store the substance of family's personal and sensitive information (i.e. enrolment information). This system is password protected and allows parents/guardians to more easily access the information retained by the service. The Service uses their childcare management software program for communicating with our community. Only current enrolled families and staff will have access to the Service's service and parent portals

The intent for the Service's childcare management software program and parent portal is to:

- keep families in touch with what's happening at the Service, including upcoming and special events
- connect with other parents/guardians and share thoughts about programs, policies, and procedures
- provide an avenue to ask parents/guardians their thoughts and provide appropriate research-based information on common child rearing issues
- provide educational information to families and employees.

Email (or other Messaging)

At times, communication with families will occur via email. Where the Service's representatives use email to communicate, this must only occur on accounts owned and managed by the service, ensuring all communication is secure and traceable.

Social Media Responsibility

All employees have a professional and ethical duty to uphold the reputation and interests of the Service and, most importantly to ensure their conduct is consistently compatible with their employment obligations and our child safety commitment when using social media for personal use. This includes refraining from any online behaviour that could compromise child safety, privacy, or the Service's reputation.

Misuse of social media can have serious consequences for the Approved Provider, the Service, its employees and families, therefore any party that posts negative or defamatory comments on the service's social media sites will be dealt with immediately and reported to the Nominated Supervisor.

The Service will use social media to support and enhance rather than replace already established and effective family communication methods. Through the Family Handbook, information will be provided regarding expectations for family communication with the service, which may include comments and posts through social media.

In giving consent, families must authorise in writing, the sharing and publication of information, photos and/or images of their child, prior to being posted on any social media sites. This consent will be specific and able to be withdrawn at any time.

The Service social media site will be used as a tool for sharing information and program updates with service families and may include (but not be limited to) the following:

- General service notices and reminders,
- Promotion of upcoming service and/or community events,
- Seeking ideas and suggestions on service program and operations,
- Providing important links and information relating to children's health and wellbeing,
- Reaffirming details provided through other family communication sources such as newsletters, notices and flyers; and/or
- Photographs depicting daily events, environment and activities, provided appropriate consent has been obtained.

The Approved Provider will authorise the establishment of all OSHC social media communication methods using the following guidelines for administration:

- A maximum of two administrators will be delegated to approve and monitor social media activity,
- Privacy settings will be defined to ensure delegated administrators approve any posts before being made public; and
- Inappropriate posts and comments will be deleted and any potential child safety concerns will be addressed immediately in accordance with this policy and procedures.
- Delegated administrators will have discretion to approve/deny access to the service's social media site.

Good judgement and common sense must be used to ensure the safety and wellbeing of children and the reputation of the Service, its employees and stakeholders are not harmed when communicating through social media. Once something is placed online, it spreads quickly and cannot be retracted.

Educators and volunteers engaged with the Service must authorise in writing, the sharing and publication of information, photos and/or images of themselves, prior to being posted on any social media sites.

Administrators of the Service social networking page will adhere to the following guidelines:

- Only families enrolled with the Service will be invited to access information,
- Under no circumstances are children attending the service to be invited to participate in the service's social networking site without explicit and informed consent of their parents/guardians and a clear understanding that their participation is voluntary,
- Only Information and/or comments relating to the activities and operations of the Service will be posted on the service's social networking site,
- Authorisation of families must be obtained before images of children can be considered for upload, in accordance with the National Model Code,
- Only community members known to the Service will be invited i.e., teachers, school leaders etc.

Where an educator becomes aware of a child being impacted or a risk of harm from an online setting (i.e. disclosure of cyber-bullying), then the service will inform the parent/guardian of this information at the earliest convenience and follow child protection protocols if a reportable matter is identified

Employee Social Media and Online Communication

Responsibility

All employees have a duty to uphold the reputation and interests of the Service beyond the hours they are at work (refer policy [4.6 Code of Conduct](#)). Educators have a responsibility to ensure their conduct is compatible with their employment obligations when using social media for personal use, recognising that their behaviour can impact children's safety and wellbeing.

Communication and information sharing via social media or otherwise has the potential to harm either a child/family or the Service reputation. Any instances of a child or their family's privacy, cultural safety, reputation or physical and emotional safety being compromised will be treated very seriously. Employees engaging in this conduct will be subject to disciplinary action, up to and including termination.

Boundaries for Online Communication and Interactions

To maintain professional boundaries and ensure child safety, there should be no personal interaction with children of the Service via social media, including being 'friends' or following accounts etc. If a child of the service attempts to interact with an educator, they should—

- not respond,
- review their privacy settings, and
- notify the Nominated Supervisor who will communicate the service's expectation with the family.

The Service name or identity cannot be mentioned in online posts or other online commentary, either directly or implied in a way that could compromise another employee or child's privacy or safety.

Employees should not discuss or disclose work-related matters in any public forum. Harmful, threatening, suggestive or harassing comments made about fellow employees or stakeholders will be viewed as cyberbullying (unlawful conduct) and will prompt disciplinary action, particularly if it impacts the child-safe culture.

Photos of employees in work uniform are not to be placed online; and If anything is posted online by others which may harm the reputation of the Service, its employees or stakeholders, and an employee has the capacity to delete such information, the Approved Provider asks that they do so immediately.

Reporting Breaches

If any employees become aware of any occurrences where a person working at the Service may have:

- posted photos or information of the Service or children without appropriate consent, or in a way that breaches the National Model Code,
- defamed, harassed or bullied any other person who works at the Service or is connected to the Service,
- displayed conduct or communication that breaches this policy; or
- posted any online material that is potentially dangerous or damaging to the image or people of the Service,

Then, the employee should immediately report this information to either the Nominated Supervisor or Approved Provider. This disclosure should not be shared with others.

All breaches will be managed as per procedures set out in policy [6.7 Feedback and Complaints Handling](#).

Employees who are also family members of children/service users may be excluded from this condition. Disclosure of the relationship with families and children of the service is **essential**. In these extenuating circumstances, the social media responsibilities will be managed on a case-by-case basis by the Nominated Supervisor or Approved Provider with child safety and privacy as the foremost consideration.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law:**
 - s.167 Offence relating to protection of children from harm and hazards
- **Education and Care Services National Regulations:**
 - R.85 Incident, injury, trauma and illness policies and procedures
 - R.86 Notification to parents of incident, injury, trauma and illness
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
 - R.174A Prescribed information to accompany notice
 - R.175 Prescribed information to be notified to Regulatory Authority
- **National Quality Standard:**
 - QA2 – Children's health and safety
 - QA4 – Staffing arrangements
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities.

Additional Regulatory Context and Guidance

- [Working with Children \(Risk Management and Screening\) Act 2000 \(Qld\)](#)
- [Criminal Code Act 1899 \(Qld\)](#)
- [Online Safety Act 2021 \(Cth\)](#)
- Queensland Government [Statement of Shared Commitment](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)
- [National Model Code Taking Images and Videos.pdf](#)

Related Policies and Procedures

[2.16 Safe Use of Digital Technologies and Online Environments](#)

[4.6 Code of Conduct](#)

[4.9 Fitness for Work](#)

[7.12 Workplace Health and Safety](#)

Policy 7.14 Social Media and ITC Usage for the Service		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V2-06.2024– Additional information relevant to establishing and management of social media		
V3-03.2025 – Policy renumbered, added to policy statement, added additional information to all roles and responsibilities, added procedures relevant to communication and information sharing with families and reporting breaches.		
V4-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards.		
V4-04.2026 – No updates		

7.15 Self-Assessment and Quality Improvement

Policy Statement

The Service acknowledges and recognises that continuous improvement is an integral part of the National Quality Framework and will take a proactive approach to establish effective processes and systems for evaluating and reviewing current practices and identifying areas and opportunities for improvement. The Service recognises self-assessment, and continuous improvement is an ongoing process, building upon previous efforts and plans, with a firm commitment to embedding child safety and wellbeing, and cultural safety at the core of all our practices.

The Approved Provider expects the Nominated Supervisor, and educators will actively work towards developing a culture of critical reflection, self-assessment and continuous improvement in every aspect of service operations, explicitly guided by child safe standards and practices.

The Approved Provider will ensure the service's Quality Improvement Plan is developed, reflecting an assessment of the quality and area of improvement that has been identified. The Approved Provider will be supported by the Nominated Supervisor, educators and OSHC Committee members in developing and reviewing the document at least annually to maintain compliance with *Education and Care Services National Regulations 55 and 56* and to ensure a continuous focus on child safety and cultural safety is maintained

Roles and Responsibilities

Approved Provider	• Ensure a QIP is developed and reviewed at least annually, and fulfills the requirements outlined in legislation, with a specific focus on identifying and improving practices related to child safety and cultural safety.
Nominated Supervisor	• Support a culture of continuous improvement and high-quality expectation by focusing on child safety and wellbeing in all improvement discussions and initiatives. • Provide a copy of the QIP when requested by the Regulatory Authority.
All Staff	• Actively contribute to the continuous improvement process by providing insights and feedback on how to enhance the safety and wellbeing of children, including their cultural safety.

Procedures

Culture of Continuous Improvement

The Nominated Supervisor and educators will be empowered to identify and respond to opportunities for continuous improvement, which includes continuous monitoring of the quality of collective and individual educator practices. This includes observing and reflecting on interactions to ensure they are respectful and culturally responsive.

As part of the Service's overall continuous improvement process, all standards and elements of the National Quality Standard will be reviewed on a regular basis in order to identify:

- Effectiveness of current practice in delivering quality outcomes for children, families and educators, with a specific lens on how practices support child safety and wellbeing and uphold cultural safety.
- Improvements to current practices, procedures and service routines; and
- Changes to be implemented as a result of review.

The Nominated Supervisor will be delegated to instruct and manage educators to improve any aspects of practice that has been identified. Where significant changes are required the Nominated Supervisor will communicate intentions to the Approved Provider.

Quality Improvement Plan (QIP) Development and Review

All stakeholders (management, educators, families and children) will be encouraged to be involved in the Service's continuous improvement process with ideas and suggestions for practice improvements welcomed, especially concerning child safety and wellbeing.

The Approved Provider will ensure that a Quality Improvement Plan is prepared and maintained for the service that:

- Contains a statement of philosophy of the service,
- Includes the assessment of the quality of practices of the service against the National Quality Standard and the National Regulations,
- Identifies the areas requiring improvement, goals and the steps to improve with clear, measurable actions for enhancing child and cultural safety,
- Maintains notes with dates of the progress being made.

The Approved Provider will ensure that the service's Quality Improvement Plan is reviewed and revised:

- At least annually, and/or
- Whenever directed by the Regulatory Authority, or
- When a significant incident or concern is identified.

The Nominated Supervisor is responsible for ensuring all relevant improvement actions are documented in the service's QIP. The Nominated Supervisor will provide reviewed versions of the QIP to the Approved Provider.

QIP Access

The Approved Provider will submit the service's current Quality Improvement Plan to the Regulatory Authority on request.

The QIP will be accessible to educators, families and other relevant stakeholders for review and feedback. This transparency is a key component of building a child-safe culture and provides a platform for families to contribute to the ongoing safety and quality of the service.

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations:**
 - R.55 Quality Improvement Plans
 - R.56 Review and revision of quality improvement plans
 - R.168 Education and care service must have policies and procedures
 - R.170 Policies and procedures to be followed
 - R.171 Policies and procedures to be kept available
- **National Quality Standard:**
 - QA1 – Educational program and practice
 - QA2 – Children's health and safety
 - QA3 – Physical environment
 - QA4 – Staffing arrangements
 - QA5 – Relationships with children
 - QA6 – Collaborative partnerships with families and communities
 - QA7 – Governance and leadership

Additional Regulatory Context and Guidance

- [My Time Our Place - Framework for School Age Care in Australia V2.0, 2022](#)
- [Child Safe Standards | Queensland Family and Child Commission](#)

Related Policies and Procedures

[6.5 Interactions and Communication with Families](#)

[7.1 Nominated Supervisor](#)

[7.3 Educational Leader](#)

[7.4 Leading Compliance and Quality Assurance](#)

[7.5 Governance and Management](#)

Policy 7.15 Self-Assessment and Quality Improvement		
Version and reason for change	Date Implemented	Date of Review
V1-11.2023 – Updated format and enhanced procedures		
V1-06.2024 – No updates		
V1-03.2025 – No updates, policy renumbered		
V2-10.2025 – Enhanced policy statement, enhanced roles and responsibilities, enhanced procedures, additional regulatory context and guidance to align with child safe standards.		
V2-04.2026 – No updates		

7.16 CCS Governance and Compliance

Policy Statement

The Approved Provider will comply with the Childcare Subsidy legislative requirements as per the Family Assistance Law associated with operating a centre based service. The Approved Provider commits to meeting its obligations to maintain financial integrity and have effective compliance systems in place to ensure childcare funding received is administered appropriately.

The Approved Provider will ensure the Service is approved under the Education and Care Services National Law and maintains Provider and Service Approval, including meeting requirements of the National Quality Framework. The Approved Provider will also continue to meet the conditions for Childcare Subsidy approval as outlined within the Childcare Provider Handbook.

To claim Childcare Subsidy to pass onto families as a fee reduction, the Approved Provider must be approved by a delegate of the Secretary of the Department of Education by showing the required evidence and information to ensure ongoing compliance with the Family Assistance Law.

The Approved Provider approved under Family Assistance Law is responsible for satisfying obligations under both Commonwealth and state laws. This obligation includes ensuring the childcare provider and relevant personnel are fit and proper persons to have the role of receiving and passing on of Child Care Subsidy payments.

Reporting and Data Security

The Approved Provider will ensure all reporting requirements for claiming and administering CCS payments will be maintained. These include the requirement for the provider to undertake fit and proper checks on all relevant key personnel (Persons with Management or Control) and ensuring background checks have been undertaken for relevant key personnel.

The Approved Provider understands it must comply with governance and financial requirements concerning payment administration of childcare funding including data security assurance used with third-party CCS software. The Approved Provider aims to maintain the financial integrity of all childcare funding by submitting correct data at all times to the Department of Education through our third-party CCS Software. The Approved Provider will ensure all reporting requirements for claiming and administering CCS payments are maintained.

Fraud Prevention

The Approved Provider will comply with the Child Care Subsidy obligations outlined under Family Assistance Law and National Law to prevent fraud and corruption from occurring within the Service. Where fraudulent behaviour is suspected or discovered the Service will follow reporting processes under Family Assistance Law and, where relevant, may result in employment action and police notification being taken.

Roles and Responsibilities

Approved Provider	• Ensure the Service meets the eligibility requirements and continues to meet conditions for Service approval as described within the Childcare Provider Handbook • Be aware of matters to be notified to the Department of Education and ensure all matters are reported within the required timeframes. • Ensure persons of management or control and persons of responsibility of day-to-day operations are fit and proper persons and have the appropriate PRODA registration in line with CCS approval. • Ensure anyone with responsibility for the day-to-day operation of the service are, and remain fit and proper, regarding matters involved in fraud, dishonesty, financial management and compliance with Family Assistance

	Law and these reviews are kept in accordance with record keeping policy and procedures. • Notify the Department of Education within the required timeframes of changes to Persons with Management or Control or employees who are not deemed 'fit and proper' to be involved in the administration of Child Care Subsidy. • Ensure that all staff comply with their legal obligations and conditions for continued approval as an authorised CCS Personnel. • Use an approved and registered third party software provider to interact with the CCS system, including submitting data in accordance with the Childcare Provider Handbook • Ensure there is effective fraud risk management procedures as part of the Approved Provider's governance framework. • Ensure all Service management and educators follow service policies and procedures and have an understanding of the consequences for fraudulent activity.
Nominated Supervisor	• Comply with all requirements to maintain PRODA registration • Monitor the day-to-day compliance of the Service's IT systems to ensure only authorised persons are accessing CCS software. • Record all payments received from families, provide receipts for payments and reconcile payments within the third-party CCS Software • Maintain the relevant records and supporting evidence on behalf of the service and ensure governance procedures are followed. • Ensure the appropriate administration of CCS payments and entitlements • Monitor for any anomalies when applying CCS as a fee reduction to families at least annually and/or upon suspicion of fraud. • Articulate clear standards and procedures to parents and employees of the Service to encourage the prevention of fraud. • Reinforce the requirements for all employees to refrain from corrupt and fraudulent conduct through the provision of regular training to personnel to assist in the identification of fraud. • Adhere to the correct procedure to ensure that all suspected fraudulent and corrupt activity is handled appropriately. • Report any individual or any suspicious activity relating to fraudulent activity to the Approved Provider and/or Department of Education.
All Staff	• Ensure service policies and procedures are followed and at all times act honestly and with integrity. • Ensure correct procedures are followed to ensure that all suspected fraudulent and corrupt activity is reported appropriately. • Report any individual or any suspicious activity relating to fraudulent activity to the Nominated Supervisor and Approved Provider.

Procedures

Overview of CCS Governance Compliance Requirements

The Approved Provider and the Service understands its obligations to comply with requirements for CCS governance and will:

- Identify specified personnel, including Persons with Management or Control, Persons with Day-to-Day Operation and Service Contacts
- ensure specified personnel have registered with PRODA
- identify and record any conflict of interest between specified personnel and the Service operation
- ensure all specified personnel are "fit and proper" and remain fit and proper in accordance with conditions described within the Childcare Provider Handbook
- ensure specified personnel have completed all required background checks as per PRODA registration and Family Assistance Law requirements

In addition and to ensure compliance, the Approved Provider must undertake background checks of:

- each person who has management or control of the provider
- each person who has responsibility for the day-to-day operation of the service

As a condition of ongoing CCS approval, the Approved Provider will ensure details are supplied to the Department of Education about each specific personnel and will notify the Department of any change to the information within the specified timeframes.

CCS Personnel

Personnel permitted to undertake related actions through the Child Care Subsidy System need to be identified as personnel as described below.

Persons with management or control of the provider

These are people who participate directly or indirectly in the decision-making or management of the provider (the legal entity) that operates the service

- a member of the group of persons responsible for the executive decision of the provider
- a person who has authority or responsibility for, or significant influence over, planning, directing or controlling the activities of the provider
- a person who is responsible for the day-to-day operations of the provider (whether or not the person is employed by the provider)
- a person who is responsible for the day-to-day operation of a childcare service, for which the provider is approved or seeking approval (whether or not the person is employed by the provider).
- a person who has authority or responsibility for, or significant influence over, planning, directing or controlling the activities of the provider

Provider Personnel may complete the following actions in relation to the Child Care Subsidy System:

- change bank account details and other information regarding the child care service
- add and remove other persons, such as persons responsible for the day-to-day operation of the service, from the Child Care Subsidy System
- authorise data submission transactions to the Child Care Subsidy System
- notify the Department of Education of the cessation of operations
- apply to add or remove a service.

Person or persons responsible for the day-to-day operation of the Service

These are Nominated Supervisors/Directors nominated by a person with management or control of the provider and responsible for the day-to-day operations of the service

When nominated to do so by the persons with management or control of the provider, they may:

- authorise data submission transactions to the Child Care Subsidy System,
- Notify the Department of Education of non-financial contact details, including addresses and phone numbers. They cannot notify the Department of Education about any other changes to information about a service.
- Discuss transaction processing results with the Department of Education.

Service Contacts/Administration

These are people nominated by the persons with management and control of the provider or responsible for day-to-day operation of the centre who are authorised to discuss family entitlements.

Induction and resignation of staff

Through the Educator induction process, the Approved Provider aims to raise awareness of employee responsibilities and have all employees contribute to maintaining a secure data environment within the service.

Data security is carefully considered when employees resign or leave a service, to prevent any unauthorised access or misuse of sensitive or confidential information. The Approved Provider in consultation with the Nominated Supervisor will ensure data is stored, used and accessed in accordance with relevant policies and procedures.

Fit and Proper Persons

A 'fit and proper person' is a person (who has met the requirements of Section 43 of the Child Care Subsidy Minister's Rules 2017) which requires a provider to undertake particular suitability checks for each Person with Management or Control of the Provider.

Under Family Assistance Law, the Approved Provider will ensure that:

- all relevant key personnel and decision makers meet fit and proper requirements,
- evidence can be provided that the necessary fit and proper checks have been undertaken for all personnel involved in the administration of receiving and passing on of the Child Care Subsidy and the Additional Child Care Subsidy to families,
- a written record of these checks, including the evidence provided in support of the applications is able to be provided at any time if requested

Determining whether a person is fit and proper

The Approved Provider will adhere to Family Assistance Law to determine if a person is deemed fit and proper to be involved in the administration of the Child Care Subsidy, matters involving fraud, dishonesty, financial management, compliance with the law and administration of funds are all relevant considerations.

The Approved Provider will notify the Department of Education with information about any new person within seven days of the new person becoming a Person with management or control of the provider. Information must declare that the provider has undertaken all background checks required for the new person, including details of the new person's working with children card.

Review of personnel to continue to be fit and proper

The Approved Provider must ensure personnel registered with PRODA as a Persons with Management or Control of the Provider or Persons Responsible for the Day-to-Day Operation of a Centre remain fit and proper as per Child Care Subsidy Handbook.

The status of persons identified with management and control will be reviewed by the Approved Provider if circumstances should arise that require notification to the Department of Education. The Approved provider will ensure all notifications are made within the required timeframes.

The Approved Provider will notify the Department of Education when any person stops having management or control of the provider including when and the reason the person stopped having management or control of the provider.

All notifications will be made through PRODA or the Provider Entry Point. Notifications may also be made directly to the Department of Education either by phone or email. Checks will be made to ensure the software is updating the required information and notifications.

CCS Reporting and Notifications

To remain eligible to administer Child Care Subsidy (CCS), the Approved Provider must notify the Department of Education of any changes within the specified timeframes as per the Childcare Provider Handbook. Failure to make required notifications may attract a penalty. Notification must be made to the Department and can be made through the third-party software or the Approved Provider Entry Point (PEP) with the required username and password. Refer policy [7.7 Managing Notifications](#).

CCS Software Security

The Services use CCS third party software which is password protected for people who are authorised to interact with the CCS Software to manage and administer data information and payments associated with the Child Care Subsidy and Additional Child Care Subsidy.

The Approved Provider will determine personnel who are required to use the CCS Software System. All personnel who are authorised to use the CCS Software will be required to meet the fit and proper requirements as set by the Department of Education.

The Approved Provider will ensure all Personnel using the software have their own secure log in username and password credentials to use the third party CCS Software. The login and password credentials will be linked to individual PRODA accounts as per Family Assistance Law and must not be shared with anyone, at any time. Authorised users are encouraged to change their passwords every 6 months.

The Approved Provider will audit staff log ins at least annually and ensure this procedure is followed by all staff who access CCS software to submit data to CCS. The Approved Provider will regularly review usernames of staff using CCS Software as well as the privacy policy of the third party CCS Software. The Approved Provider will ensure usernames and passwords used for CCS Software have not been shared or compromised.

Nominated Supervisor/ Responsible Person / educators will:

- keep passwords confidential and not share with anyone,
- log out of sites to ensure security of information,
- never request another staff member's log in/ password or personal details regarding CCS Software.

Data Integrity

Third party CCS Software will be monitored by the Approved Provider to ensure data integrity and security is maintained by all staff who process CCS payments to families. The Approved Provider will conduct an audit using the CCS Compliance Checklist/Audit to ensure the accuracy of data submitted to the Department of Education through our CCS Software in relation to CCS and ACCS payments.

The Approved Provider implements processes and procedures to ensure the accuracy of data that is submitted through the CCS Software with reports generated by the third party CCS Software regularly cross referenced against records kept at the service. CCS Payment reports and invoices are electronically stored for future cross referencing and checking.

CCS Data Breaches

The Nominated Supervisor will advise the Approved Provider as soon as possible regarding any potential threat to security information and access to data sensitive information. The Approved Provider will notify the Office of the Australian Information Commissioner (OAIC) by using the online Notifiable Data Breach Form in the event of a possible data breach. This could include:

- A data base or CCS Software with personal information about children and/or families is hacked
- Personal information about a child is mistakenly given to the wrong person

This applies to any possible breach within the Service or if the CCS Software is hacked from an online source

Fraud Prevention

The Approved Provider will establish a range of internal controls to prevent fraud which may include conducting a risk assessment to identify any risk of fraud and corruption. Where necessary, an action plan will be developed to put into place any strategies and/or controls required to minimise the risk of fraud and corruption.

Actions used to Detect and Identify Fraud

The Approved Provider and all employees have a responsibility for the mitigation of fraud and/or corruption within the Service. If employees become aware of a serious crime committed by another employee or a family, they are required to report it to management.

Reporting a Breach of a Reportable matter

The Approved Provider aims to foster a culture of transparency and accountability while supporting employees to report any reasonable suspicion of reportable matters of improper, illegal or misconduct within the service to management including, but not limited to:

- Breaches of the service code of Conduct or service policies
- Breaches of relevant Laws and Regulations
- Criminal activity or corruption

- Improper or misleading financial practices

All persons associated with the Service must be able to report fraudulent activity, including suspected fraudulent activity, relating to CCS to the Approved Provider and/or directly to CCS via the CCS Tip-Off Line. Information about any potential breach of Child Care Subsidy can be provided anonymously by contacting the Department of Education tip-off line on: 1800 664 231 or in writing through tipoffline@education.gov.au

The Approved Provider will implement protective practices to ensure the identity of an employee is not compromised or disclosed, where applicable, following a report of a reportable matter including storage of documents in a secure and confidential manner and ensuring access to confidential documents is restricted to authorised personnel only. Once a report has been made the matter may be investigated through a formal investigation.

Where allegations of fraud are substantiated, the Approved Provider may be subject to penalties which may include recovering overpaid funds, cancelling the service approval and pursuing a criminal fraud prosecution. Employees may be held responsible for certain breaches of the law including deception or by giving false or misleading information. Consequences for committing or attempting fraud may include warnings, dismissal, repayment of misappropriation of funds or referral to prosecution agencies.

Maintaining and Retaining CCS Records

To maintain CCS approval, providers must keep certain records and notify the Department of Education of certain events. Failure to keep these records and provide the required notifications can result in an infringement notice, civil penalty order, criminal prosecution, suspension or cancellation of provider or service approvals, or other penalties.

All providers must keep and maintain the following records:

- complaints made to the provider, or to any of the services of the provider, relating to compliance with Family Assistance Law
- a record of attendance for each child for whom care is provided (regardless of eligibility for Child Care Subsidy), including records of any absences from care
- statements or documents demonstrating that additional absence days in excess of the initial 42 absence days satisfy requirements.
- copies of invoices and receipts issued for the payment of childcare fees
- copies of all Statements of Entitlement issued, and any statements issued to advise that there was a change of entitlement.

The Nominated Supervisor will ensure:

- backups of important and confidential data are made regularly (monthly is recommended)
- backups are stored securely either offline, or online (using a cloud-based service)
- software and devices are updated regularly to avoid any breach of confidential information

Legal and Regulatory Foundation

In preparing and implementing this policy, the Approved Provider recognises the obligations and requirements related to –

National Quality Framework

- **Education and Care Services National Law**
- **Education and Care Services National Regulations:**
- **National Quality Standard:**
 - QA7 – Leadership and Management

Additional Regulatory Context and Guidance

- [A New Tax System \(Family Assistance Administration\) Act 1999](#)
- [Child Care Subsidy Minister's Rules 2017](#)
- [Child Care Subsidy Secretary's Rules 2017](#)
- [Family Assistance Law](#)

- Department of Education - [Child Care Provider Handbook](#)

Related Policies and Procedures

[7.5 Governance and Management](#)

[7.10 Fees, Statements and Parent Gap Fee Payments](#)

[7.11 Child Care Subsidy \(CCS\) and Additional Child Care Subsidy \(ACCS\) Management and Compliance](#)

Policy 7.16 CCS Governance and Compliance		
Version and reason for change	Date Implemented	Date of Review
V1-10.2025 – New policy to meet Family Assistance Law requirements		
V2-04.2026 – Updated policy statement, updated Approved Provider roles and responsibilities, enhanced procedures relevant to Overview of CCS governance compliance requirements, removed additional procedural information in determining a fit and proper person, enhanced procedures relevant to CCS Software security and data integrity		