

PROGRESSIVE PLAY®

CHILD SAFETY & WELLBEING POLICY

Version: October 2026

1. About this Policy

Progressive Play® is a registered business name operated by Janelle Ford, ABN 64 862 566 558. Progressive Play® is a registered Australian trademark owned by Janelle Ford (Australian Trademark No. 2422858). This Policy describes Progressive Play's® approach to the safety, rights, participation and wellbeing of children and young people in child-facing services and related activities.

2. Commitment to Child Safety

Progressive Play® is committed to environments in which children and young people are safe, respected, heard and supported to participate. Child abuse, exploitation, grooming, neglect, violence, discrimination and conduct creating unacceptable risk are not tolerated.

3. Who this Policy Protects

For this Policy, a child or young person is a person under 18 unless applicable law uses a different definition for a particular obligation. Age, developmental stage, communication, disability, culture, identity and evolving capacity are considered when applying this Policy.

4. Scope – Progressive Play® Personnel and Independent Facilitators

This Policy applies directly to Progressive Play® and to people engaged or authorised by Progressive Play® to undertake child-facing activities on its behalf, including employees, contractors, volunteers, students or placement participants where applicable.

A person who completes a Progressive Play® course or holds a Progressive Play® facilitator certificate or digital badge does not become an employee, contractor, worker, representative, agent or service provider of Progressive Play® merely because they completed the training or hold the credential.

Inclusion in the Progressive Play® facilitator directory likewise does not mean that the facilitator works for Progressive Play®, provides services on behalf of Progressive Play®, or is supervised or controlled by Progressive Play®.

Independent facilitators remain responsible for the safety, safeguarding, screening, mandatory-reporting, professional, insurance, employment and other legal requirements applying to their own practice, employer, organisation and jurisdiction.

Progressive Play® does not supervise, manage or assume responsibility for the day-to-day professional practice or conduct of an independent facilitator merely because that person completed Progressive Play® training or appears in the facilitator directory.

5. Queensland Child Safe Framework

Progressive Play® is based in Queensland, Australia and has regard to the Child Safe Organisations Act 2024 (Qld), the Queensland Child Safe Standards and the Universal Principle to the extent they apply to its activities. Progressive Play® also has regard to the National Principles for Child Safe Organisations. Mandatory requirements of another jurisdiction must also be followed where applicable.

6. The 10 Child Safe Standards

Progressive Play's® approach addresses: child safety embedded in leadership, governance and culture; children informed of rights and participating in decisions; families and communities informed and involved; equity and diverse needs respected; suitable and supported people; child-focused complaints; ongoing education and training; safe physical and online environments; regular review and improvement; and documented child-safe policies and procedures.

7. Universal Principle – Cultural Safety

Progressive Play® recognises the universal principle requiring an environment that promotes and upholds the cultural safety of Aboriginal and Torres Strait Islander children. Identity, culture, family, community and connection are respected, and racism and culturally unsafe conduct are not tolerated.

8. Children's Rights

Children have rights to safety, dignity, privacy, participation, communication and non-discrimination and to have their views taken seriously. Information should be provided in a form the child can understand. Communication may include speech, AAC, gesture, signing, behaviour, visual communication, writing or another method used by the child.

9. Participation, Voice and Choice

Children are encouraged to express preferences, concerns, boundaries and choices. Progressive Play® uses child-led, strengths-based and neuro-affirming approaches where appropriate. Reluctance, distress, withdrawal or communication of 'no' is taken seriously rather than treated merely as non-compliance.

10. Consent and Assent

Consent is obtained from the legally authorised person where required and the child's meaningful assent is also sought where appropriate to age, capacity and the activity. Consent by an adult does not remove the need to attend to the child's expressed wishes, distress, safety or dignity. Consent and assent are ongoing processes.

11. Neuro-Affirming and Disability-Inclusive Practice

Children are not expected to suppress harmless neurodivergent traits, perform neurotypical behaviour for appearance, or communicate in one prescribed way as a condition of respectful participation. Reasonable adjustments, communication supports, sensory needs, processing time and preferences are considered where relevant and practicable.

12. Equity, Diversity and Inclusion

Progressive Play® seeks equitable and inclusive environments for children of diverse abilities, cultures, languages, family structures, socioeconomic circumstances, genders and backgrounds. Additional attention is given to children who may experience barriers to being heard, believed, included or protected. Discrimination, harassment, bullying and victimisation are not acceptable.

13. Families and Communities

Parents, carers and families are important partners in safety and wellbeing and are provided with relevant information subject to the child's rights, privacy and law. Family involvement does not override safeguarding obligations or a child's right to protection from harm.

14. Suitable and Supported People

People engaged by Progressive Play® to work with or around children must be suitable for their role and meet applicable screening, qualification, registration, supervision and legal requirements. Where Queensland Blue Card or another screening scheme applies, Progressive Play® will comply with the applicable requirements.

Any person actually engaged or authorised by Progressive Play® to undertake child-related work on behalf of Progressive Play® must meet the screening and other child-safety requirements legally applicable to that role and jurisdiction. In Queensland, this includes a current Blue Card where Queensland law requires one.

15. Independent Learners and Facilitators – Child-Safety Responsibilities

Individuals who complete Progressive Play® training and subsequently work with children or young people independently, through their own business, or for another employer or organisation are responsible for understanding and complying with the child-safety and safeguarding requirements applicable to their role, profession, employer or organisation, activities and jurisdiction.

Before engaging in child-related work, independent learners and facilitators must obtain and maintain any Working with Children Check, Blue Card, Working with Vulnerable People registration, child-related employment screening, professional registration, licence, clearance or other approval required by applicable law or by their employer or organisation.

Independent learners and facilitators are also responsible for applicable mandatory-reporting requirements, codes of conduct, professional standards, child-safe policies, supervision requirements and safeguarding procedures relevant to their work.

Progressive Play® training, certification, a digital facilitator badge or inclusion in the Progressive Play® facilitator directory does not replace, satisfy or constitute a Working with Children Check, Blue Card, professional registration, licence or other statutory clearance.

Progressive Play® does not undertake to verify or continuously monitor the screening, registration, employment status or ongoing legal compliance of independent facilitators unless Progressive Play® expressly states that a particular verification has been undertaken.

Independent facilitators remain responsible for ensuring that they are legally and professionally authorised to undertake the child-related work they perform.

16. Code of Conduct with Children

People acting for Progressive Play® must maintain professional boundaries, use respectful and appropriate communication, protect privacy and avoid grooming, exploitation, humiliation, intimidation, coercion or abuse. Inappropriate secrecy, sexualised conduct, exploitative relationships and unauthorised private communication are prohibited. Necessary physical assistance must be proportionate, respectful and consistent with safety, consent and professional obligations.

17. One-to-One Work

One-to-one work may be appropriate for therapeutic, educational or support purposes. Where practicable it should occur with ordinary professional safeguards such as known appointment times, parent/carer awareness and environments supporting appropriate accountability. Therapeutic privacy should be balanced with safeguarding.

18. Physical Environment Safety

Reasonable steps are taken to manage foreseeable risks including access and exits, equipment, choking and trip hazards, emergency arrangements, supervision, health information provided, sensory needs and accessibility. Small construction pieces require consideration of age, developmental needs, mouthing risk and supervision.

19. Online and Digital Safety

Online services use reasonable privacy, boundary and safety safeguards. Personal social-media accounts should not be used for private practitioner-child communication unless specifically authorised and professionally appropriate. Images, recordings and screenshots of children must not be created or shared without an appropriate lawful basis and any required consent.

Progressive Play® has regard to current e-Safety Commissioner guidance for child-safe organisations, including identifying online risks, safe use of digital technologies, reporting online abuse and supporting children and families affected by online harm.

20. Photography, Video and Media

Participation does not automatically permit identifiable photographs, video or audio to be used for marketing. Appropriate consent must be obtained where required for uses beyond service delivery or documentation, and the child's views and assent should be sought where appropriate.

21. Privacy and Confidentiality

Personal and sensitive information about children and families is handled under the Progressive Play® Privacy Policy and applicable law. Confidentiality cannot be promised where disclosure is required or authorised to protect a child or comply with law.

22. Child-Focused Complaints

Children, young people, parents and carers may raise concerns about safety, treatment, boundaries, discrimination, privacy or service quality. Complaints should be accessible,

respectful, timely and proportionate and must not disadvantage a child for speaking up. Children may communicate concerns through their preferred communication method or a trusted person.

23. Responding to Disclosures

A person receiving a disclosure should listen calmly, take the child seriously, avoid interrogation or conducting their own investigation, avoid promises of secrecy, accurately record relevant information and escalate or report according to law and procedure. Immediate safety needs take priority.

24. Mandatory Reporting

Mandatory reporting obligations vary by jurisdiction, profession, role and circumstances. Progressive Play® and practitioners acting within it will comply with duties that apply to them. Independent professional reporting duties remain the practitioner's responsibility. Emergency services should be contacted where appropriate for an immediate threat to life or safety.

In Queensland, the Child Protection Act 1999 (Qld) identifies specified mandatory reporters, including registered nurses, doctors, teachers, certain police officers, child advocates and early childhood education and care professionals. A person must comply with the reporting duties that apply to the capacity in which they are acting.

Queensland's Criminal Code also contains broader child-sexual-offence reporting and protection duties. In particular, section 229BC creates an offence where an adult, without reasonable excuse, fails to disclose to police as soon as reasonably practicable information that causes, or ought reasonably to cause, the adult to believe that another adult is committing or has committed a child sexual offence against a child within the statutory scope. Section 229BB also creates a failure-to-protect offence for accountable persons in the circumstances specified by that section.

These duties have statutory definitions, thresholds and exceptions. Progressive Play® will apply the current legislation to the particular facts rather than relying only on this summary.

25. Australian State and Territory Requirements

Child-protection reporting, working-with-children screening, reportable-conduct, information-sharing and related safeguarding laws differ between Australian states and territories.

Where Progressive Play® provides a child-facing service in another Australian jurisdiction, Progressive Play® and each practitioner must comply with the mandatory requirements that apply to that activity, role and location. This may include the relevant Working with Children Check or equivalent screening scheme and jurisdiction-specific mandatory reporting or reportable-conduct requirements.

Progressive Play® will not assume that compliance with Queensland requirements automatically satisfies another state's or territory's law. Current official government guidance for the jurisdiction in which the child-facing service occurs should be checked when required.

26. Queensland Reportable Conduct Scheme

Queensland's Reportable Conduct Scheme commenced on 1 July 2026. Progressive Play® will comply if and to the extent it is a reporting entity under the Child Safe Organisations Act 2024 (Qld). This Policy does not assert that Progressive Play® is necessarily a reporting entity merely

because child-safe standards apply or are adopted; coverage must be assessed separately against the legislation and activities.

27. Reportable Conduct

Where the Queensland scheme applies, Progressive Play® will use the statutory definitions and current QFCC guidance for reportable conduct, including relevant categories such as sexual offences or misconduct involving a child, ill-treatment, significant neglect, physical violence and behaviour causing significant emotional or psychological harm.

28. Allegations Against Workers or Representatives

Allegations are taken seriously and managed with regard to child safety, procedural fairness, privacy, evidence preservation, professional reporting duties and statutory requirements. Protective action may be taken before final determination where reasonably necessary to manage risk. Protective action is not itself a finding that an allegation is substantiated.

29. Grooming and Boundary Concerns

Grooming, escalating boundary violations, inappropriate gifts, secrecy, favouritism, sexualised communication, unauthorised private contact and attempts to isolate a child are safeguarding concerns even where physical harm has not been alleged.

30. Bullying and Peer Harm

Bullying, intimidation, discrimination and harmful behaviour between children are addressed with safety as the priority while recognising developmental, communication, disability and support needs. Responses distinguish the child from the behaviour and seek safety, accountability, support and learning. Serious peer harm may require safeguarding escalation.

31. Distress and Restrictive Practices

Distress behaviour is considered in the context of communication, unmet needs, environment, sensory factors, trauma, safety and regulation. Restrictive practices are not used merely for convenience, compliance or behaviour normalisation. Any regulated restrictive practice must only be used where lawfully authorised and by people permitted to use it under applicable safeguards.

32. Trauma-Informed Safety

Progressive Play® seeks to avoid unnecessary shame, fear, coercion or retraumatisation. Predictability, choice, clear communication, relational safety and regulation supports are used where relevant. Trauma-informed practice does not displace safety requirements or legal reporting obligations.

33. Suicide, Self-Harm and Acute Risk

Where a child communicates suicidal thoughts, self-harm risk or another acute mental-health safety concern, Progressive Play® responds according to the immediacy and seriousness of risk,

practitioner role and competence, professional obligations and available emergency or specialist supports. Progressive Play® services do not replace emergency mental-health care.

34. Medication and Health Needs

Medication is only administered, stored or managed where expressly agreed, the practitioner is authorised and competent, and appropriate instructions, consent, storage, documentation and emergency arrangements exist. Where Progressive Play® is not responsible, parents, carers or the relevant service remain responsible for medication arrangements.

35. Emergency and Incident Response

Progressive Play® maintains proportionate arrangements for foreseeable emergencies and incidents. Responses may include first aid, contacting parents/carers, emergency services, moving people from danger, documenting incidents, notifying authorities or insurers and reviewing controls. Immediate safety takes priority.

36. Safe Use of Construction Materials

Construction materials are selected and used with regard to age recommendations, developmental level, individual needs, choking and mouthing risk, sensory preferences, cleanliness, supervision and intended activity. Damaged or unsuitable pieces are removed. A child should not be required to use material creating an unreasonable safety or sensory risk where a reasonable alternative is available.

37. Off-Site Activities and Transport

Any Progressive Play® off-site activity or transport responsibility requires appropriate risk, consent, supervision, insurance and legal arrangements. This Policy does not itself authorise transportation of children or excursions. Responsibilities with other organisations should be clarified where reasonably practicable.

38. Visitors, Contractors and Third Parties

Visitors, contractors, students, volunteers or third parties who may have contact with children must be managed proportionately to the nature and level of contact and applicable screening or supervision requirements. A third party's presence does not remove Progressive Play's® responsibility to manage foreseeable risks within its control.

39. Record Keeping

Child-safety concerns, disclosures, incidents, reports, decisions and actions are documented accurately and securely where appropriate. Records should distinguish observed facts, direct statements and professional interpretation. Access is limited to people who reasonably require the information.

40. Information Sharing for Safety

Information may be shared without consent where required or authorised by law or where another lawful basis permits disclosure for safety. Only information reasonably necessary for the safeguarding or legal purpose should be shared where practicable.

41. Training and Professional Development

People working with children should receive or maintain training appropriate to their role and responsibilities, including child safety, professional boundaries, recognising and responding to concerns, reporting obligations, inclusion and communication needs. Progressive Play® reviews training needs proportionately to its workforce and services.

42. Supervision and Support

Where relevant to role and service, Progressive Play® supports reflective practice, professional supervision or consultation, particularly where complex risk, safeguarding, boundaries or child wellbeing concerns arise.

43. Risk Management

Child-safety risks are considered in service design, activities, environments, online delivery, staffing, resources, complaints and incidents. Controls are proportionate to foreseeable risk and are reviewed when circumstances or information change.

44. Continuous Improvement

Progressive Play® reviews child-safety practices following incidents, complaints, identified risks, legislative or regulatory change, feedback and other relevant information. Children, families and practitioners may contribute to improvement where appropriate.

45. External Providers and Venues

Where services occur at a school, community venue or another organisation, Progressive Play® and the host organisation may have separate child-safety obligations. Responsibilities should be clarified where practicable. Progressive Play® does not assume another organisation's legal obligations merely by attending its premises.

46. NDIS and Child Safety

Where Progressive Play® provides NDIS-funded services, applicable NDIS Practice Standards, Code of Conduct, incident-management, restrictive-practice and safeguarding requirements are followed to the extent they apply. NDIS requirements operate alongside, not instead of, other child-safety laws.

The NDIS Code of Conduct applies to both registered and unregistered NDIS providers and relevant workers. Registered NDIS providers have additional obligations, including incident-management and reportable-incident requirements under the NDIS Commission framework.

Where Progressive Play® is required to notify an NDIS reportable incident, the current statutory categories and notification timeframes must be followed. Unauthorised restrictive practices and

behaviour-support obligations must also be managed under the current NDIS rules where applicable.

47. Services Outside Australia

Where Progressive Play® itself provides a child-facing service to a child located outside Australia, applicable mandatory child-protection, safeguarding, reporting, privacy, professional-practice and emergency requirements of the child's location must be considered in addition to Australian obligations that continue to apply.

This Policy does not purport to summarise the child-protection laws of every country. Before providing an ongoing or material child-facing service in another country, Progressive Play® should identify the mandatory local requirements relevant to that service and obtain specialist advice where reasonably necessary.

A learner or independent facilitator located outside Australia remains responsible for the laws, professional standards and safeguarding requirements applicable to their own practice. Progressive Play® training does not replace local legal advice or confer authority to practise in another jurisdiction.

48. Changes in Law and Guidance

Child-safety legislation, QFCC guidance, NDIS requirements, professional standards and government guidance may change. Progressive Play® takes reasonable steps to monitor material changes and update this Policy as soon as reasonably practicable, but instantaneous updating cannot be guaranteed. Current mandatory law takes precedence over outdated wording.

49. Breaches of this Policy

A suspected breach is assessed according to seriousness and risk. Responses may include immediate safety action, supervision changes, access restrictions, investigation, reporting, referral, disciplinary or contractual action and policy or system improvement. Responses must comply with applicable law and procedural fairness.

50. No Retaliation

A child, family member, worker or other person must not be victimised or disadvantaged for raising a genuine child-safety concern, making a complaint, assisting an investigation or making a lawful report.

51. Review of this Policy

This Policy is reviewed periodically and earlier where there is a significant incident, legislative or regulatory change, material change in services, or identified gap in child-safety practice.

52. Governing Context

Progressive Play® is based in Queensland, Australia. Queensland and Commonwealth requirements apply as relevant, and mandatory requirements of another state or territory apply

where Progressive Play's® activities engage those laws. This Policy does not replace a practitioner's independent professional or legal obligations.

53. Responding to Child Safety Concerns

Progressive Play® training does not replace an individual's or organisation's child safety, safeguarding, mandatory reporting or professional obligations.

Where a child safety concern arises during the delivery of LEGO® Based Therapy, LEGO® Serious Play® or any other activity facilitated by a person who has completed Progressive Play® training, the facilitator must respond in accordance with applicable legislation, mandatory reporting requirements, organisational policies and procedures, professional obligations and the requirements of the relevant state or territory.

Concerns regarding suspected abuse, neglect, harm or risk of harm must be reported to the appropriate authority where required. Where there is an immediate risk to a child's safety, emergency services should be contacted by calling 000.

Progressive Play® is not a child protection authority and does not receive, investigate or determine child protection matters arising within independently delivered services or professional practice.

Approved

4th October 2026