CHILD PROTECTION AND CHILD SAFE STANDARDS POLICY

Date last reviewed	February 2026
Next review date	February 2027

What areas does this policy cover

- **Child Protection**
- **Child Safe Standards**
- **Respond to a Child in Risk of Significant Harm**
- **Reportable Conduct Scheme**

Policy Statement

At **Bullfrog Children's Centre**, our goal is to ensure that every reasonable precaution is taken to protect all children being educated and cared for at our service from risk of significant harm.

Bullfrog Children's Centre is committed to fully implementing and embedding the **NSW Child Safe Standards (2022)** across our leadership, governance, culture and daily practices. We actively promote a child safe culture where:

- Child safety is embedded in organisational leadership and governance
- Children are informed about their rights and supported to participate in decisions affecting them
- Families and communities are informed and involved in promoting child safety
- Equity, inclusion and cultural safety are upheld
- Staff and volunteers are suitable, trained and supported
- Complaints processes are child-focused and accessible
- Physical and online environments minimise opportunities for harm
- Child safe practices are continuously reviewed and improved

Bullfrog Children's Centre recognises our responsibility to uphold children's rights to safety, care and protection. We are committed to ensuring the safety, welfare and wellbeing of every child in our care and acknowledge our legal obligation as Mandatory Reporters under the Children and Young Persons (Care and Protection) Act 1998 to report children suspected to be at risk of significant harm.

This policy aligns with:

- Education and Care Services National Law
- Education and Care Services National Regulations
- Child Protection (Working with Children) Act 2012
- NSW Child Safe Standards (2022)
- Reportable Conduct Scheme (NSW Ombudsman)

Bullfrog Children's Centre maintains zero tolerance for child abuse and is committed to maintaining a safe, transparent and accountable environment for all children.

Background Statement

The Education and Care Services National Regulations require approved providers to ensure their services have policies and procedures in place in relation to Child Safe Standards and Child protection. Bullfrog Children's Centre sees protection and wellbeing as a priority in all practices. Adhering to Child Safe Standards is an essential component of a safe and nurturing learning environment.

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CHILD PROTECTION AND CHILD SAFE STANDARDS POLICY

Legislative Requirements

Area	Legislation / Regulation	NQS	EYLF
Child Protection	Education and Care Services National Law s.167, Education and Care Services National Regulations Reg 82, 168(2)(h), 176, Children and Young Persons (Care and Protection) Act 1998 – Mandatory Reporting (ROSH) Ombudsman Act 1974	QA2 Elements 2.2, 2.2.2, 2.2.3, QA7 - 7.2.1	Outcome 1, 3 Principle – Ongoing learning & reflective practice
Child Safe Standards	NSW Child Safe Standards (2022) – Office of the Children's Guardian National Regulations Reg 155, 181	QA2 and 7 Element 4.2.1, 5.1.1, 7.1.2	Outcome 1 Principle – Secure, respectful and reciprocal relationships Principle – High expectations & equity

Induction and ongoing training

On induction all new Employees are required to familiarise themselves with all Policies and Procedures of Bullfrogs Children's Centre. Should information be updated or there are changes to this policy or the Legislative Requirements associated with this policy, Employees will either be informed or will undergo training at the next staff meeting.
Child Protection training will meet all legislative requirements.

Policy reviewed

This policy and procedures will be reviewed by Management, Employees, Families and Children annually. Management will review, then forward to Employees and Families to review via Kinderloop. Children will review as part of a talking mat process.

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CHILD PROTECTION AND CHILD SAFE STANDARDS POLICY

Child Protection

Purpose

The purpose of this policy at Bullfrog Children's Centre is to:

- Ensure the safety, welfare and wellbeing of all children in our care
- Provide clear procedures for identifying and responding to children at risk of significant harm (ROSH)
- Ensure all staff understand their legal obligations under NSW legislation
- Promote and embed the 10 Child Safe Standards into everyday practice
- Provide guidance for documenting and reporting concerns
- Ensure allegations against staff are managed lawfully, fairly and promptly

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Definitions

At Risk of Significant Harm (ROSH) Indicators

At Bullfrog Children's Centre, a child is considered at risk of significant harm when there are current concerns for their safety, welfare or wellbeing due to one or more of the following:

- Basic physical or psychological needs are not being met
- Necessary medical care is not arranged
- Required education is not arranged
- Exposure to domestic violence and family violence
- Serious psychological harm caused by caregiver behaviour
- Prenatal report where risk factors remain
- Unexplained injuries
- Sexual abuse or exploitation
- Neglect of basic needs
- Inadequate supervision
- Substance abuse by caregivers impacting child safety
- Risk of self-harm or suicide
- Persistent absence from education due to neglect
- Unsafe living conditions

Staff at Bullfrog Children's Centre are not required to prove abuse before making a report.

Mandatory Reporter

A person who is legally required under relevant legislation to report suspected child abuse or neglect.

Reasonable Grounds

Reasonable grounds exist when an educator or staff member suspects a child may be at risk based on:

- Observations
- Professional judgement
- Disclosure by a child
- Information provided by another person

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CHILD PROTECTION AND CHILD SAFE STANDARDS POLICY

Implementation

Organisational responsibility:

- Ensuring all adults working with children hold a verified NSW Working with Children Check
- Rigorous Employment process
- Providing Child Safe eLearning during staff induction
- Child protection training - CHCPRT025 Identify & Report Children & Young People at Risk and National mandatory child safe foundation and advanced Course
- Ensuring educators under 18 years are supervised at all times during toileting and nappy changing
- Embedding the 10 Child Safe Standards into service operations
- Enforcing safe digital technology practices:
    - No iPads or devices in nappy change/bathroom areas
    - Only authorised service devices are to be used
    - Smart watches prohibited unless medically authorised
- Displaying the Child Protection Helpline (132 111)
- Providing access to the NSW Mandatory Reporter Guide (MRG)
- Minimising time alone with children and visible areas across the service
- Maintaining confidential and secure documentation systems
- Reviewing this policy annually or following legislative updates
- **Head of Entity's** Named and displayed **– Kimberly Wheatley**

Confidentiality

Confidentiality of all child protection matters. Information relating to child protection concerns will be collected, stored, and disclosed only to authorised personnel and relevant authorities in accordance with applicable New South Wales legislation, mandatory reporting requirements, and service policies and procedures.

Protection from Victimisation

No employee, volunteer, or contractor will be disadvantaged, discriminated against, or subjected to retaliation for making a report in good faith regarding concerns about a child's safety or wellbeing.

Record Keeping

The service will maintain confidential records of:

- Allegations and disclosures.
- Risk assessments.
- Notifications to authorities.
- Investigation processes and findings.
- Outcomes and actions taken.

All records will be stored securely and accessed only by authorised persons.

Roles and Responsibilities

Roles	Responsibility
Approved Provider	• Ensuring the service complies with all relevant child protection legislation, regulations, and Child Safe Standards. • Providing a safe environment that promotes the safety, welfare, and wellbeing of all children. • Ensuring policies and procedures relating to child protection and mandatory reporting are implemented and reviewed regularly.

	• Supporting educators and staff to fulfil their child protection obligations. • Ensuring all staff receive appropriate child protection training and professional development. • Maintaining secure and confidential records of child protection concerns, reports, and actions taken. • Cooperating with relevant child protection authorities and regulatory bodies.
Nominated Supervisor	• Implementing and monitoring child protection policies and procedures within the service. • Providing guidance and support to educators and staff regarding child protection concerns. • Ensuring concerns regarding a child's safety, welfare, or wellbeing are documented and reported promptly. • Liaising with child protection authorities when required. • Maintaining confidentiality and secure record keeping. • Ensuring all educators and staff understand their mandatory reporting obligations. • Promoting a child-safe culture throughout the service.
Educators	•Providing a safe, nurturing, and supportive environment for all children. •Remaining vigilant to signs and indicators of abuse, neglect, or significant risk of harm. •Responding appropriately to disclosures made by children. •Documenting concerns accurately, objectively, and in a timely manner. •Reporting concerns to the Nominated Supervisor and/or relevant authorities in accordance with legislative requirements. •Participating in child protection training and professional development. •Maintaining confidentiality and respecting the privacy of children and families. •Supporting children's rights to feel safe, valued, and heard.
Families	•Working collaboratively with the service to promote the safety and wellbeing of their children. •Providing accurate and up-to-date information relevant to their child's care and welfare. •Informing the service of any circumstances that may affect their child's safety or wellbeing. •Respecting the service's child protection policies and procedures. •Supporting their child to communicate concerns and seek assistance when needed.
Children	• Express their views, feelings, and concerns in a safe and respectful environment. • Seek support from trusted educators or adults when they feel unsafe, worried, or uncomfortable. • Participate in decisions that affect them where appropriate. • Develop an understanding of their rights, personal safety, and protective behaviours. • Treat others with respect and contribute to a safe and inclusive environment.

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CHILD PROTECTION AND CHILD SAFE STANDARDS POLICY

Child Safe Standards

Implementation

Bullfrog Children's Centre is committed to implementing the 10 NSW Child Safe Standards to ensure a child-safe culture across all aspects of our service. We embed child safety in leadership, governance, policies, daily practice and continuous improvement processes.

The service will:

- Embed child safety into organisational leadership, governance and culture
- Promote children's participation in decisions affecting them
- Ensure families and communities are informed and involved
- Uphold equity and respect diversity
- Ensure all people working with children are suitable and supported
- Maintain child-focused complaint and reporting procedures
- Provide ongoing child protection and child safe training for staff
- Ensure physical and online environments minimise risk
- Regularly review and improve child safe practices
- Maintain clear documentation demonstrating child safe compliance

Bullfrog Children's Centre ensures that child safety is a standing agenda item in staff meetings and reflective practice sessions. Risk assessments consider child safety at all times, including supervision, environment layout, excursions, and digital technology use.

Procedure

To uphold the Child Safe Standards, Bullfrog Children's Centre follows these procedures:

1. **Child Safety Culture**
    - Child safety is prioritised in decision-making.
    - Leadership models professional and ethical conduct.
    - Code of Conduct outlines expected behaviours and boundaries.
2. **Safe Recruitment**
    - All staff, students and volunteers hold a verified Working With Children Check (WWCC).
    - Referee checks and screening processes are completed prior to employment.
3. **Training & Induction**
    - All staff complete child protection and child safe training upon commencement.
    - Ongoing professional development is provided annually.
4. **Child Participation**
    - Children are supported to express their views and feelings.
    - Educators encourage children to speak up about safety concerns.
5. **Reporting & Complaints**
    - Clear reporting procedures are displayed.
    - Staff use the Mandatory Reporter Guide when concerns arise.
    - Complaints are handled promptly, confidentially and in a child-focused manner.
6. **Risk Management**
    - Supervision plans minimise risk.
    - No personal devices are used in bathroom or nappy change areas.
    - Online safety measures are implemented.

7. **Continuous Review**
    - Policies are reviewed annually.
    - Feedback from staff, children and families informs improvements.

Code of Conduct – Child Safe Standards Aligned
This Code of Conduct outlines the expected behaviours of all staff, educators, students, volunteers and contractors at Bullfrog Children's Centre to ensure the safety and wellbeing of children.

1. Commitment to Child Safety
All adults at the service must:
- Act in the best interests of the child at all times.
- Treat all children with dignity, respect and fairness.
- Promote children's rights, cultural safety and inclusion.
- Follow all child protection and reporting procedures.

2. Professional Boundaries
Adults must:
- Maintain appropriate physical, emotional and professional boundaries.
- Ensure interactions with children are transparent and in line with service policy.
- Avoid being alone with a child where possible; maintain visibility at all times.
- Use positive guidance and behaviour support strategies.

Adults must NOT:
- Engage in inappropriate physical contact.
- Show favouritism.
- Develop personal relationships with children or families outside professional boundaries.
- Use physical punishment, intimidation or shaming.

3. Safe Physical and Online Environments
Adults must:
- Actively supervise children.
- Follow toileting and nappy change supervision procedures.
- Use only authorised service devices.
- Never use personal devices in bathroom or nappy change areas.
- Protect children's privacy when using digital platforms.

4. Listening and Responding to Children
Adults must:
- Encourage children to express their views and feelings.
- Listen respectfully to disclosures.
- Respond calmly and appropriately.
- Follow mandatory reporting requirements when concerns arise.

Adults must NOT:
- Dismiss or ignore a child's concern.
- Ask leading questions during a disclosure.
- Promise outcomes or secrecy.

5. Reporting Concerns
All staff are Mandatory Reporters under the Children and Young Persons (Care and Protection) Act 1998 and must:

- Use the NSW Mandatory Reporter Guide.
- Report suspected risk of significant harm.
- Inform the Nominated Supervisor (unless allegation involves them).
- Call 000 in an emergency.

Failure to report concerns may result in disciplinary action.

6. Confidentiality
All information relating to child safety must:

- Be handled confidentially.
- Be shared only with authorised persons or agencies.
- Be stored securely in accordance with regulations.

7. Breaches of the Code
Breaches of this Code of Conduct will:

- Be taken seriously.
- Be investigated promptly.
- Result in appropriate action, which may include disciplinary action, suspension or termination.
- Be reported to relevant authorities where required.

Acknowledgement
All staff, educators, students, volunteers and contractors at Bullfrog Children's Centre are required to read, understand and sign this Code of Conduct upon commencement and annually thereafter.

Respond to a Child in Risk of Significant Harm (outside the service)

Procedure

Step 1: Recognise and Respond

If a child discloses abuse or a staff member observes indicators of harm:

- Remain calm and listen carefully.
- Reassure the child that they have done the right thing by speaking up.
- Do not make promises of confidentiality.
- Do not investigate or ask leading questions.
- Record the child's words as accurately as possible.

Educators must not:

- Ask leading questions
- Promise outcomes
- Guarantee changes in circumstances

Step 2: Immediate Safety Assessment

Determine whether the child is in immediate danger.

If there is an immediate threat to life or safety:

- Contact emergency services immediately.
- Take reasonable steps to ensure the child's immediate safety.
- Notify the Child Protection Officer or manager as soon as practicable.

Step 3: Document Concerns

Complete a Child Protection Incident Report including:

- Child's name and identifying details.
- Date, time, and location of concern.
- Factual observations.
- Statements made by the child.
- Names of witnesses, if any.
- Actions taken.
- Records must be objective, factual, signed, and dated.

All child protection reports, and related documentation will be:

- Maintained securely.
- Accessible only to authorised personnel.
- Retained in accordance with legislative and organisational requirements.

Step 4: Report the Concern

The staff member must immediately notify the Child Protection Officer/ Director or manager. This could also be the Head of Entity.

The Child Protection Officer or designated manager will:

- Review the information.
- Determine reporting obligations.
- Contact the relevant child protection authority if the threshold for significant risk of harm is met.
- Document all actions and decisions.

Staff at Bullfrog Children's Centre will:

- Use the NSW Mandatory Reporter Guide
- Contact the Child Protection Helpline (132 111) if threshold is met
- Call 000 in emergencies
- Continue supporting the child after reporting

If a Nominated Supervisor does not make a report and an educator believes reasonable grounds exist, the educator is legally obligated to make the report independently.

Step 5: Ongoing Support

Following a report:

- Maintain confidentiality.
- Continue to support the child in a safe and appropriate manner.
- Cooperate with child protection authorities and law enforcement agencies.
- Monitor the child's wellbeing and document any further concerns.

Bullfrog Children's Centre

CHILD PROTECTION AND CHILD SAFE STANDARDS POLICY

Reportable Conduct Scheme Procedure

Scope
This policy applies to:

- Approved Providers
- Nominated Supervisors
- Responsible Persons
- Educators
- Staff members
- Volunteers
- Students
- Contractors
- Families and visitors to the service

Definitions
Reportable Conduct
Reportable conduct includes:

- Sexual offences committed against, with, or in the presence of a child.
- Sexual misconduct towards, with, or in the presence of a child.
- Ill-treatment of a child.
- Neglect of a child.
- Physical violence against a child.
- Behaviour causing significant emotional or psychological harm to a child.
- Significant breaches of professional boundaries involving a child.

Reportable Allegation
An allegation that an employee or worker has engaged in reportable conduct or conduct that may constitute a criminal offence involving a child.

Implementation Procedure

Step 1: Receiving a Concern or Allegation
Any person who becomes aware of alleged reportable conduct must:

- Ensure the immediate safety of the child.
- Report the concern immediately to the Nominated Supervisor or Approved Provider.
- Record factual information only.
- Maintain confidentiality.
- Avoid discussing the matter with unauthorised persons.

Step 2: Immediate Risk Assessment
The Approved Provider will:

- Assess any immediate risk to children.
- Implement protective measures where required.
- Consider temporary alternative duties, supervision arrangements, or suspension of the employee if necessary.
- Contact emergency services where there is an immediate threat to safety.

Step 3: Notification Requirements
The Approved Provider must:

- Notify the NSW Ombudsman of a reportable allegation or reportable conviction within seven business days.
- Provide required information regarding the allegation and proposed actions.
- Notify other authorities where required, including:
  - NSW Police
  - Department of Communities and Justice (DCJ)
  - NSW Department of Education
  - Office of the Children's Guardian

Step 4: Investigation Process
The service will:

- Conduct a risk assessment.
- Develop an investigation plan.
- Ensure procedural fairness for all parties.
- Gather relevant information and evidence.
- Interview relevant persons where appropriate.
- Maintain confidentiality throughout the process.
- Keep accurate records of all actions taken.

Step 5: Investigation Findings
At the conclusion of the investigation:

- Findings will be documented.
- The NSW Ombudsman will be notified of the outcome.
- Appropriate disciplinary, regulatory, or protective actions will be implemented.
- Risk management strategies will be reviewed.

Step 6: Ongoing Support
The service will:

- Support affected children and families.
- Provide access to counselling or employee assistance services where appropriate.
- Monitor the wellbeing of those affected.
- Review policies, procedures, and practices to prevent future incidents.

"OCG Reporting Timeframes" summary:

Requirement	Timeframe
Internal reporting to Nominated Supervisor/Approved Provider	Immediately
Risk assessment completed	Within 24 hours
Notification to OCG	Within 7 business days
Interim report to OCG	Within 30 calendar days
Final report to OCG	At completion of investigation
Procedure review	Annually and after each matter