

CHILD SAFETY AND WELLBEING PROCEDURE

Contents

1.	Introduction.....	2
2.	Commitment.....	2
3.	Purpose.....	2
4.	Scope	3
5.	Definitions.....	3
6.	Child Safe Organisation	4
6.1.	Child Safe Standards	4
6.2.	Reportable Conduct Scheme	5
6.3.	Mandatory reporting	6
7.	Procedure	6
7.1.	The Nature Parks expectations.....	6
8.	Working with Children Checks (WWCCs)	10
9.	Responding to Child Safety Concerns.....	11
9.1.	Responding	11
9.2.	Reporting	12
9.3.	Sharing of Information.....	13
9.4.	Support	14
10.	Records and Documentation	14
11.	Communication and Training.....	15
12.	Code of Conduct.....	15
12.1.	Breach of Procedure	15
13.	Related documents	16
14.	Review and Approval	16

1. Introduction

The Phillip Island Nature Parks (the Nature Parks) is committed to ensuring the safety and wellbeing of children and young people in their care, those who participate in the Nature Parks activities and/or programs, use the Nature Parks facilities and those who enjoy the public spaces that the Nature Parks oversees.

Children need to feel safe in terms of their:

- Environment
- Identity and Culture
- Communication and/or Physical barriers
- Accessibility
- Diversity of background and/or other influences

Furthermore, the Nature Parks recognises that children and young people have distinctive insights into their lives, needs and the world around them, and it is their human right to be heard on matters affecting their lives.

The Child Safe Standards recognise that children and young people bring unique capabilities, experiences and views that can assist organisations to be child safe. Organisations can disempower children and young people when they don't recognise these strengths or seek, and shut down, their voices. Child safe organisations value and celebrate children and young people for who they are and the contributions they make. They also recognise that because of their age, children and young people can be disempowered and are at greater risk of experiencing harm.

Empowerment and participation are particularly important for children and young people who are more likely to be misunderstood, marginalised or discriminated against. This includes children who are Aboriginal, Torres Strait Islander, from newly arrived communities, who identify as LGBTQIA+ or live with disability including, but not limited to, physical, sensory, intellectual, psychosocial, cognitive or neurodevelopmental disabilities.. Creating organisations that are culturally safe, inclusive, welcoming and accessible, benefits everyone.

2. Commitment

The Nature Parks is committed to the safety and wellbeing of children and is committed to creating and maintaining a child safe organisation. The Nature Parks understands that child safety is everyone's responsibility. The Nature Parks prides itself on being a child safe organisation with zero tolerance for child abuse.

Our commitment will be enacted through the implementation and monitoring of the Child Safe Standards, as specified un

der the *Child Wellbeing and Safety Amendment (Child Safe Standards) Act 2015*.

3. Purpose

The purpose of the Child Safe Procedure is to ensure all instances, allegations, disclosures or reasonable concerns of abuse or neglect involving children and young people, are accurately reported and effectively responded to by the Nature Parks and that children and young people have a voice in our workplace.

This procedure outlines the mandatory responsibility of all Nature Parks employees, volunteers and contractors to report the abuse, neglect or ill-treatment of any child or young person caused by any person (employee, volunteer, contractor, customer or community member) that contravenes our policies and procedures, such as those outlined in the *Code of Conduct POL-0008*. It will also assist in helping employees identify when a matter may need to be escalated externally, to authorities such as Victoria Polic, as set out in Section 6.3.

Compliance with this procedure ensures all incidents are reported and managed in a way that is responsive to the immediate circumstances of the incident, the rights of those involved, and wherever possible, any risks of recurrence are minimised.

This procedure assists employees, volunteers and contractors to:

- Recognise the different types of abuse and neglect.
- Respond to the immediate needs of individuals involved in an incident (including personnel) and guide responses to allegations and matters of concern, including breaches of the *Code of Conduct POL-0008*.
- Ensure their legal responsibilities are upheld when working with children and young people.

4. Scope

Applies to:	Board Members CEO	Employees	Volunteers, Interns and Students	Contractors	Visitors
	✓	✓	✓*	✓*	x

- * The Nature Parks employees responsible for coordinating and supervising volunteers, interns, students or contractors must ensure that they have informed the volunteers, interns, students or contractors of the requirements of this procedure.

5. Definitions

Term	Definitions
Child Abuse	Means all forms of physical abuse, emotional ill-treatment, sexual abuse and exploitation, neglect or negligent treatment, commercial or other exploitation of a child and includes any action that results in actual or potential harm to a child.
Child	Means a minor below the age of 18 years who may or may not be unaccompanied by a responsible adult.
Child protection	Means any responsibility, measure or activity undertaken to safeguard children from harm.
Student	A young person between 12-18 years of age participating in organised work experience program activities.

Term	Definitions
Reasonable belief	A belief formed when a reasonable person in the same position, with the same information, would have formed the same belief. It does not require proof of harm, but must be based on more than rumour, speculation, or personal feelings
Reportable Allegation	Reportable allegation means information that suggests a person who is a worker (including an employee, volunteer, contractor or other person engaged by the Nature Parks) has engaged in reportable conduct or misconduct that may be reportable under the Reportable Conduct Scheme in Section 6.2. An allegation may be reportable whether or not it is proven and must be escalated in accordance with this procedure.
Bullying	A deliberate misuse of power in relationships through repeated verbal, physical and/or social behaviour that is intended to cause physical, social or psychological harm. It can be carried out by an individual or a group, involve real or perceived power imbalances, and include behaviours that happen in person or online. The key elements are that the behaviour is ongoing, repeated (or likely to be repeated), and causes harm. Single incidents or equal conflict between students are not considered bullying under this definition. Bullying has been described as taking many forms which are often interrelated and include: • Verbal (name calling, put downs, threats) • Physical (hitting, punching, kicking, scratching, tripping, spitting) • Social (ignoring, excluding, ostracising, alienating) and/or • Psychological (spreading rumours, stalking, dirty looks, hiding or damaging possessions)
Young person	Whilst not explicitly defined in legislation, this term often refers to individuals typically aged between 12 to 17 years old.
Former participant	Refers to any child or young person who has previously engaged in any program, service or attraction offered by the Nature Parks, but who is no longer actively participating. This definition includes any child or young person who has completed, withdrawn from, or otherwise ended their involvement with the program, regardless of the duration of their participation or the time elapsed since their last active involvement.
Programs and services	An activity or program is any activity operated, coordinated, or managed by the Nature Parks that promotes engagement and participation of children and/or young people. The Nature Parks provides programs and services that encourage the participation of children and young people. This can include, but is not limited to: • Employment • Participation within the Nature Parks attractions or conservation activities • Volunteering • Education based services and activities • Work experience, internships and specialised programs
Nature Parks Personnel	Nature Parks personnel includes all Board member, employees, volunteers, contractors, interns and students acting on behalf of the Nature Parks,

6. Child Safe Organisation

Responding to and reporting child abuse and neglect is one component of being a child safe organisation and is part of being compliant with Child Safe Standards (the Standards) and the Reportable Conduct Scheme. This section outlines the key legislation and standards that the Nature Parks must comply with.

6.1. Child Safe Standards

The Standards were part of the response to the 2013 Victorian Parliamentary Inquiry into the Handling of Child Abuse by Religious and Other Non-Government Organisations (the Betrayal of Trust Inquiry). They were introduced via an amendment to the *Child Safety and Wellbeing Act 2005*, and from January 2017, all Victorian organisations that provide services for children were required to comply with the Standards.

In July 2021, a new set of Standards were legislated and came into effect on 1 July 2022. the Standards are as follows:

1. Organisations establish a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal and Torres Strait Islander children and young people are respected and valued.
2. Child safety and wellbeing is embedded in organisational leadership, governance and culture.
3. Children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously.
4. Families and communities are informed and involved in promoting child safety and wellbeing.
5. Equity is upheld, and diverse needs respected in policy and practice.
6. People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
7. Processes for complaints and concerns are child focused.
8. Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
9. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
10. Implementation of the Child Safe Standards is regularly reviewed and improved.
11. Policies and procedures document how the organisation is safe for children and young people.

Although all children are vulnerable, some children face additional vulnerabilities, namely Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse backgrounds, children with disabilities and children with a specific gender or sexual identity. Consequently, in applying each Standard, organisations must embed the four following key principles by promoting:

- The cultural safety of Aboriginal and Torres Strait Islander children.
- The cultural safety of children from culturally and/or linguistically diverse backgrounds.
- The safety of children with a disability.
- The safety of children with a specific gender or sexual identity.

The Standards help build a child safe culture within an organisation and ensure that organisations are accountable for the safety of children using their services and facilities. Compliance with the Standards is regulated and monitored by the Social Services Regulator..

6.2. Reportable Conduct Scheme

The Reportable Conduct Scheme (the Scheme) requires organisations to respond to allegations of child-related misconduct made against workers (employees and contractors) and volunteers and report any allegations to the Social Services Regulator . There are five types of reportable conduct:

1. Sexual offences committed against, with or in the presence of a child.
2. Sexual misconduct committed against, with or in the presence of a child.
3. Physical violence against, with or in the presence of a child.
4. Any behavior that causes significant emotional or psychological harm to a child.
5. Significant neglect of a child.

The Social Services Regulator has the power to receive allegations and findings of reportable conduct, assess an organisation's systems to prevent, notify and investigate reportable conduct, provide oversight of workplace investigations, investigate allegations in some circumstances, refer findings to professional registration bodies and the Working with Children Check Unit, build the capacity of organisations to respond to allegations of abuse and report to Parliament on performance of the scheme and trends.

6.3. Mandatory reporting

Mandatory reporting refers to the legal requirement of certain professional groups to report a reasonable belief of child abuse to child protection authorities.

In Victoria, under the *Children, Youth and Families Act 2005*, mandatory reporters must make a report to child protection authorities if, in the course of practicing their profession or carrying out duties of their office, position, or employment, they form a belief on reasonable grounds that a child is in need of protection from physical injury or sexual abuse. At the Nature Parks, this is not currently relevant for our employees, and the Nature Parks does not have employee roles that would satisfy the positions of mandatory reporters, but that may change in the future. For a complete list of professions mandated to report in Victoria, refer to <https://providers.dhhs.vic.gov.au/mandatory-reporting>

It is a criminal offence for a mandated reporter to fail to report abuse if they have a reasonable belief that abuse has or is likely to occur.

Failure to protect

In Victoria, failure to protect is an offence when staff believe there is a significant risk of harm to children (under the age of 18) by other staff in the organisation, and

- They fail to report to someone of a higher authority; or
- They are in a position of authority to remove or reduce that risk and they fail to do so.

Failure to protect may result in legal implications, including imprisonment.

Failure to report

In Victoria, it is a criminal offence for personnel of an organisation to fail to protect children under the age of 16 from sexual abuse by another member of that organisation.

7. Procedure

Keeping children and young people safe is a shared responsibility across the Nature Parks. We have developed a set of procedures and expectations to address risks to child safety and to establish a safeguarding culture and practices for the children and young people using attractions, programs, services and/or facilities.

7.1. The Nature Parks expectations

The Nature Parks recognises its legal and moral responsibilities to keep children and young people safe from harm; it promotes their health and wellbeing and supports their best interest. The Nature Parks has policies, procedures, and training in place that supports its leaders, employees, contractors and volunteers to achieve these commitments. The Nature Parks creates environments where all children – including children with disabilities, Aboriginal and Torres Strait Islander children, and children from cultural and linguistically diverse backgrounds, inclusive of gender – have a voice. They are listened to, their views are respected, and they contribute to how we plan for, design and implement our services and attractions.

7.1.1. Role boundaries

The Nature Parks personnel will not, of their own volition or at the request of a service or attraction user, act or engage in activities, or provide additional support or care outside the confines of their duties (as specified in their position description) when delivering a Nature Parks program or service. This includes but is not limited to:

- Providing unauthorised transportation to a child or young person.
- Providing a babysitting/nanny service to a child or young person.
- Seeking contact with a child or young person, or former participants, outside the Nature Parks services or attractions, (for example, via social media).
- Accepting an invitation to attend any private social function at the request of a child or young person who has participated, or is participating, in the Nature Parks programs or services. This does not preclude accepting an invitation or meeting with a family member or carer directly in relation to the child or young person's participation.
- Developing any 'special' relationships with a child or young person that could be seen as favouritism (for example, offering gifts or special treatment for specific children).
- Engaging in open discussions of a mature or adult nature in the presence of children (for example, personal social activities).

7.1.2. Pre-existing relationships with children and young people

The Nature Parks recognises that some employees or volunteers may have pre-existing relationships with children and young people who access the Nature Parks services and attractions. As such, they may, in some instances, provide babysitting, nanny, or transport services, and/or attend a function at the request of a child or young person, or their parent/guardian. To safeguard the wellbeing of children and young people, the Nature Parks personnel must disclose to their leader any pre-existing relationships with minors in their care. This disclosure will enable the leader to assess and decide if further measures are necessary. If a staff member or volunteer is required to provide assistance to a child or young person which is beyond the expectations of that

person's role, or outside the scope of the Nature Parks usual services and attractions, the employee or volunteer must immediately:

- Call 000 if the child or young person is in immediate danger.
- Seek advice from their leader or the Chief Warden.
- Refer the matter to the Nature Parks Child Safety Advisor (People and Culture Manager)

The Nature Parks provides a range of direct and indirect services to children and young people. We acknowledge that the Nature Parks personnel will at times need to apply common sense and good judgement when dealing with unique circumstances and/or critical instances involving children or young people.

7.1.3. Language and tone of voice

The Nature Parks personnel in the presence of children and young people, will use language and tone of voice which:

- Provides clear direction.
- Is reassuring and affirming.
- Is not discriminatory, racist or sexist.
- Is not derogatory, belittling or negative.
- Is not intended to threaten or frighten.
- Is not profane or sexual.

7.1.4. Supervision

The Nature Parks personnel are required to avoid one-on-one unsupervised situations with children and young people to whom the Nature Parks provides services, or who visit the Nature Parks attractions. Where appropriate and possible, all activities and/or discussions with children and young people should be conducted in view of other adult colleagues. The Nature Parks acknowledges that this may not be possible in the provision of some services, and in providing supervision to work experience students. The Nature Parks personnel responsible for supervising children and young people participating in the Nature Parks services or attractions must ensure that those children are not exposed to risks that pose a threat to their health, safety or welfare – including risks posed by other children and young people.

7.1.5. Electronic and online communications

The Nature Parks personnel are required to follow the Nature Parks *Information, Communication and Technology Management Policy POL-0010* and all related procedures in relation to electronic communications and social media. Unless a child or young person is engaged in programs as an employee, volunteer, student or intern, all electronic communication between personnel and children or young people must be authorised by a manager. Where a manager is unable to provide guidance, the communication should be referred to the Marketing and Communications department. No personal electronic mediums can be used to communicate with children or young people for or on behalf of the Nature Parks. The Nature Parks personnel must not have any online contact with a child's parent(s)/guardian unless it is transparent to the organisation and forms part of an approved program.

Where a parent and/or guardian is not included in the communication (for example, direct messaging via social media/text messaging):

- Restrict such communication to issues directly associated with delivering the Nature Parks services and attractions, such as advising that a scheduled event has been cancelled.
- Ensure that this communication is via a channel that is visible and accessible to leader of the department.

7.1.6. Giving gifts

The Nature Parks personnel are required to follow the *Gifts, Benefits and Hospitality Procedure PRO-0011* and all related procedures in relation to gifts. The Nature Parks may provide promotional, corporate, or recognition of service (student placement) gifts to children or young people, for example a Nature Parks promotional sticker or drink bottle to children or young people visiting the Nature Parks as part of a school or group visit. In this case each child or young person in the group should receive the same items to avoid any preferential treatment.

The Nature Parks personnel must not give personal gifts to children and young people who participate in the Nature Parks provided programs and services, unless these gifts are part of the program or services delivered.

7.1.7. Photographs of children and young people

Images (photograph and film) of children and young people should only be taken for the purpose of promoting, documenting and publishing the Nature Parks programs, services, attractions and events. The following requirements must be met for all images of children and young people:

- A Talent Consent and Release Form FRM-0006 must be completed for any image/footage of children taken with the intention of sharing. Any child image requires a parent's or legal guardian's consent via this signed form. Images and footage without supporting paperwork must be deleted.
- The use of personal devices in capturing images or videos containing children is strictly prohibited.
- The context is directly related to participation in, or promotion of the Nature Parks services or programs.
- The child or young person is appropriately dressed and posed.
- Any caption or text accompanying an image is checked to ensure it does not identify a child or young person if such identification could be potentially detrimental.
- Images are stored in compliance with the Nature Parks obligations, *Privacy and Data Protection Act 2014* and the *Information Communication and Technology Management Policy POL-0010*.

7.1.8. Physical contact with children and young people

Any physical contact with children and young people must be in a manner which is safe and adheres to the Child Safe Standards. Physical contact must be appropriate to the delivery of the Nature Parks services and programs. The Nature Parks personnel should not under any circumstances have any physical contact with children or young people participating in the Nature Parks services, programs, attractions and events that:

- Involves touching of genitals, buttocks, the breast area except what is required as part of delivering first aid. If contact with these areas was required as part of delivering such services, it should be in the presence of another employee or the parent/guardian of the child, unless in an emergency situation.

- Would appear to a reasonable observer to have a sexual connotation.
- Intends to cause pain or distress to the child or young person.
- Is physical, for example, wrestling, horseplay, tickling or other roughhousing.
- Is unnecessary.
- Is initiated against the visiting of the child or young person, except if such contact may be necessary to prevent injury to the child or young person or to others, in which case:
 - Physical restraint should be a last resort and only used in an urgent or emergency situation, such as when applying first aid or protecting another child.
 - All such incidents must be reported to the Child Safety Advisor and documented through the submission of an incident report as soon as possible.
- Any physical contact initiated by a child or young person that is sexual and/or inappropriate must be reported to the Child Safety Advisor.

When contact is appropriate, the Nature Parks employees and volunteers are encouraged to seek the consent and assess the comfort level of the child or young person prior to initiating contact, such as asking the child or young person if they would like to shake hands.

7.1.9. Overnight stays and sleeping arrangements

The Nature Parks will not support overnight stays or sleep outs involving children and young people without a thorough risk assessment and approval of the Child Safety Advisor and Chief Executive Officer.

7.1.10. Change and bathroom facilities

The Nature Parks personnel should not supervise children and young people in change and bathroom facilities. The Nature Parks attractions and reserves have toilet, shower and/or change facilities that are available to the general public and are unsupervised. It is the responsibility of the carers of children and young people to provide adequate supervision when utilising these facilities.

7.1.11. Uniform or identity card/pass/badge

The Nature Parks personnel should at all times wear identification/uniform when delivering the Nature Parks programs and services to children and young people.

7.1.12. Use, possession or supply of alcohol or drugs

The Nature Parks applies the requirements relating to drugs and alcohol as set out in the *Drugs and Alcohol Procedure PRO-0037*. While on duty, the Nature Parks personnel must not:

- Use, possess or be under the influence of an illegal drug, be incapacitated by alcohol or legal drugs such as, prescription or over-the-counter medications that interfere with a person's ability to care for children and young people involved in the Nature Parks services, attractions, programs or events.
- Supply alcohol or drugs, including tobacco, to children and young people participating in the Nature Parks services, attractions, programs or events unless as a result of administering First Aid.

7.1.13. Transporting children

Children and young people are to be transported only in circumstances that are directly related to the delivery of the Nature Parks programs and services.

8. Working with Children Checks (WWCCs)

All Nature Parks employees, volunteers and designated contractors are required to have a current Working with Children Check (WWCC). A role typically requires a WWCC based on legislative requirements and Child Safe Standards risk assessment if they:

- Work/volunteer in services and programs that care for/educate/support children whether supervised or unsupervised; or
- Are required to work with or visit a child-based service (childcare centre, kindergarten, school) on a regular basis; or
- Are not engaged in work that is specifically child-related but do have direct contact with children; and
- May reasonably be expected to come into direct contact with children on a regular basis during the course of their work or whilst representing the Nature Parks. This includes attending the Nature Parks attractions or community events where children or families are participating.

Regular contact with children refers to at least six (6) occasions per calendar year.

It is an offence for an employer to knowingly engage a worker who does not hold a valid Working with Children Check (or equivalent) for a child-related activity. It is an offence for an employee, volunteer, contractor and, where identified, sub-contractor to engage in child-related work when they do not have clearance. Penalties include imprisonment and/or fines.

The Nature Parks has opted to apply a whole-of-business compliance approach, whereby all employees and volunteers of the Nature Parks are required to hold a current WWCC at all times, irrespective of their role and responsibilities.

The Nature Parks requires employees to cover the initial expense of obtaining a WWCC. The Nature Parks will cover the expense of maintaining up-to-date certification during the employee's employment with the Nature Parks.

9. Responding to Child Safety Concerns

The four steps that all personnel must follow regarding incidents, allegations, disclosures, or reasonable concerns of abuse or neglect, as well as breaches of policy and procedure, are:

1. Responding
2. Reporting
3. Sharing of information
4. Supporting

9.1. Responding

Immediate response must mitigate further harm and ensure the safety of children/young people, the Nature Parks personnel and members of the public. Reduce the harm and risk to those impacted by the incident by:

- Calling Emergency Services on 000 if required.
- Making the surroundings safe to prevent immediate recurrence of the incident. This includes, for example, removing potentially harmful individuals, increasing supervision of children and young people, moving uninvolved children and young people away from the incident, relocating to a safe place, and alerting others to risks that extend beyond the immediate area, such as other areas within the Nature Parks facilities.
- Providing immediate care and support to the child/young person and others involved in the incident through addressing:
 - Physical wellbeing (e.g. providing first aid)
 - Emotional wellbeing (including psychological support, e.g. arranging for coverage of duties and supervision)
 - Facilitating access to counselling (for staff or volunteers involved in incident through the Employee Assistance Program)
 - Responding to a disclosure/allegation

When responding to a disclosure or allegation by a child or young person, employees or volunteers should respond by:

- Listening to the allegation or disclosure supportively, without disputing it.
- Clarifying the basic details, without seeking detailed information or asking suggestive or leading questions. Avoid repeated questioning and record the child's words as provided.
- Providing reassurance that the child or young person has done the right thing in telling you, that they are believed, and that our organisation will take immediate action in response to the disclosure or allegation.
- Explaining to the child or young person that other people may need to be informed to stop what is happening. Do not promise to keep any information confidential.
- Reporting the matter as per organisational requirements as early as possible to ensure all information is captured.

In your responses you will need to consider the specific needs of the child or young person. Consider the unique characteristics of a child including, for example, whether the child is Aboriginal or Torres Strait Islander, has a disability, identifies as LGBTQI+ has a culturally and linguistically diverse background and/or is unable to live at home.

9.2. Reporting

Once the immediate response to the situation is completed, it is important to fulfill the internal and external reporting requirements. The Nature Parks personnel are required to report any reasonable concerns or instances of abuse or neglect – defined as cases in which a child or young person has suffered, or is likely to suffer significant harm – immediately.

It is not the role of the Nature Parks personnel to identify or investigate an allegation / concern, however they must continually report each new instance of suspicion of harm and / or breach of policy as they become aware, and to seek advice from their leader when they are unsure.

The Nature Parks personnel should follow the guidance on the incident report to complete the form accurately and to the best of their ability. All reports must be documented fully, written factually and objectively. Clear and accurate reporting can assist to support any internal or external investigation which may transpire after an incident.

Contacts

Child Safety Advisor People and Culture Manager	Michelle Stewart 0429 688 077
Chief Executive Officer	Catherine Basterfield 0409 925 578
Department of Fairness, Families and Housing	After hours Child Protection Emergency Service - 13 12 78
Victorian Commission for Children and Young People	1300 78 29 78
Social Services Regulator	childsafegroups@ssr.vic.gov.au 1300 310 778

Internal reporting requirements

All child and young person safety incidents must be recorded on the incident report system which is forwarded to the Child Safety Advisor and Chief Executive Officer. The relevant leader will also be notified. All incidents are entered into the incident reporting system, which is accessible to all employees.

An incident report should be completed as soon as possible following an incident. The Child Safe Advisor can assist with this process.

All Nature Parks personnel are responsible for

- Ensuring the immediate response was sufficient and taking any further action needed, including completing and logging an incident report fully on the Nature Parks incident reporting system.
- Working with the Child Safety Advisor and notifying the Chief Executive Officer where required.
- Providing confirmation to the reporter (individual who reported incident) that all required steps have been completed to manage the incident until it is closed off, whilst maintaining privacy and confidentiality obligations.
- Reporting critical incidents to the Chief Executive Officer. In the case of reportable conduct incidents – where the allegation meets the threshold for reporting to Social Services Regulator– the Child Safe Advisor and Chief Executive Officer (will establish a Child Safe Standards (CSS) Group. The CSS Group will act as, or appoint, an internal or external investigator. The CSS Group consist of the Child Safety Advisor, the leader of employee(s) concerned, and a People and Culture representative. The CSS Group serves a central point for supporting responses to incidents and for managing and collecting information on incidents.

The Nature Parks has external reporting requirements, including legal reporting obligations. All reportable conduct incidents that require external authority notification to the Social Services Regulator must be reported to the Chief Executive Officer.

9.3. Sharing of Information

The Nature Parks maintains the confidentiality and privacy of all concerned (including the alleged perpetrator), except if doing so would compromise the safety or wellbeing of the child or young person and/or investigation of the allegation. After an incident has been reported, and, where appropriate, the information sharing process with the child/young person, their families and involved personnel will begin as soon as reasonably possible. The process will be adapted to meet the needs of the child/young person, their family and involved personnel, as well as the requirements of any investigation processes. Where police and/or child protection are involved, the Nature Parks will provide the authorities with information about the incident to assist them in their investigations.

Where personnel are involved in breaches of the *Code of Conduct POL-0008* or this *Child Safety Wellbeing Procedure PRO-0041*, the People and Culture team will advise on internal communications regarding action taken, if appropriate.

If the incident meets the threshold for reporting to external agencies, our organisation will consult with the relevant child protection authority or police to determine what information can be shared with parents or caregivers.

Police and/or child protection will be consulted about the disclosure of information to the child/young person, their families and personnel.

The decision to share information will consider:

- Whether sharing or withholding information could compromise the ongoing safety of those involved in or impacted by the incident.
- The advice of police and child protection, with care taken not to compromise their investigations.
- The rights of those impacted by the incident to privacy, confidentiality, procedural fairness and a presumption of innocence in accordance with the Nature Parks policies, procedures and employment law, and
- The need (of those potentially impacted by the incident) to know of the incident.

9.4. Support

Supporting the needs of those impacted by the incident should include considerations of cultural safety and wellbeing for:

- The child/young person and their family, including any specific support needs for individuals from Aboriginal and Torres Strait Islander; culturally and linguistically diverse backgrounds, or people with a disability, LGBTQI+, or those unable to live at home.
- The Nature Parks employees or volunteers and other children who witness and/or reported the incident.
- Any employees, volunteer or contractor against whom a complaint is made, for example, offering the Employee Assistance Program (EAP).
- Other employees, volunteer or contractor impacted by the incident.

All other employees, volunteers or contractors who are aware of the incident should note that:

- Any allegation does not imply guilt, and the allegation will be properly investigated, ensuring the right to 'procedural fairness'.
- They must not discuss any aspect of the incident with anyone outside of Victoria Police, child protection authorities and/or the Nature Parks Child Safety Advisor, and then only when in direct relation to the investigation of the allegation.

10. Records and Documentation

All child safety incident reports will be recorded on the Workplace Health and Safety (WHS) System and regularly reviewed by management to ensure the effectiveness of actions taken and identify areas for improvement.

The Nature Parks Child Safety Advisor will oversee the administration of completed child safe incident reports and any other documentation relating to the allegation and subsequent action.

To prevent access by unauthorised persons, our organisation stores documentation associated with an allegation of abuse or neglect of a child or young person and breaches of the procedure in the following manner:

- Electronic documentation stored in a restricted location, accessible only to authorised personnel involved in managing child safe activities and incidents. Access is managed directly by the Child Safe Advisor.

The Nature Parks will maintain and regularly monitor records of incident reports as part of our incident management process to ensure they are responded to effectively in accordance with this policy, and that reporting requirements to external authorities are met. These records will also inform reviews of this procedure.

11. Communication and Training

The Nature Parks will, wherever reasonably practicable, communicate the *Child Safety Wellbeing Procedure PRO-0041* and its requirements to children, young people and their families and our personnel. The Nature Parks ensures all new personnel are informed and supported to understand our *Occupational Health and Safety Policy POL-0012* and child safe procedures, paying particular attention to the practices detailed in this procedure.

Employees are informed that copies of this procedure and the *Code of Conduct POL-0008* are available on the intranet. The Nature Parks will also provide training and guidance relating to child safety to all employees on induction, and at least annually.

12. Code of Conduct

The Nature Parks *Code of Conduct POL-0008* outlines the expectations and requirements for how the Nature Parks employees, volunteers and contractors will behave that is in alignment with our values and prioritises integrity in relationships to ensure positive outcomes for our organisation and community.

It outlines the Nature Parks support for a zero-tolerance approach to child abuse and its adherence to the Victorian Child Safe Standards and related legislation including 'failure to disclose', 'failure to protect' and grooming offences.

12.1. Breach of Procedure

If the Nature Parks personnel fail to report instances, allegations or concerns related to abuse or neglect of a child or young person by any personnel within our organisation, or in the delivery of programs and services, the Nature Parks considers such failure a serious matter, and breaches of this procedure may result in disciplinary action.

In addition to any internal proceedings and reporting, all incidents will be reported to the Social Services Regulator and any suspected or actual breaches of law will be reported to the police.

If an allegation has been made against any Nature Parks employee, board member and/or volunteer relating to inappropriate behaviour towards a child or young person outside of work, the Nature Parks reserves the right to suspend that person during the investigation period.

The Nature Parks understands that a failure to report incidents of abuse, neglect and harm of child or young person may be classed as a criminal offence under state law. The Nature Parks personnel are obligated to report any information relating to:

- Incidents, allegations, disclosures or reasonable concerns in relation to abuse or neglect of a child or young person at the Nature Parks, either by personnel within our organisation or by others.
- Any breaches or actions by other personnel within our organisation that contravene our policies and procedures, as outlined in our Nature Parks *Code of Conduct POL-008*.

This procedure prohibits all Nature Parks personnel from discussing any concerns or allegations with unauthorised individuals, either within or outside the organisation. This prohibition not being intended to limit their rights or responsibilities to report their concerns or allegations but is part of our organisation's commitment to ensuring privacy, confidentiality and natural justice. It also serves to prevent the making of deliberately false, misleading, or vexatious allegations. The *Public Interest Disclosures Act 2012* will take precedence in any situation involving the reporting of personnel.

All children and young people within our organisation are informed of our procedure and provided with unconditional support and mechanisms to feel empowered to speak up if they feel, hear or see something that does not feel right to them or makes them feel unsafe. They will be heard without judgement and their feedback or complaints are taken seriously and responded to promptly and thoroughly.

13. Related documents

Legislation / regulations	• <i>Crimes Act 1958 (VIC)</i> • <i>Child Wellbeing and Safety Amendment (Child Safe Standards) Act 2015</i> • <i>Public Interest Disclosures Act 2012</i>
Policies and Procedures and Forms	• Code of Conduct POL-0008 ○ Drugs and Alcohol Procedure PRO-0037 ○ Gifts, Benefits and Hospitality Procedure PRO-0011

	○ Respect at Work PRO-0041 • Occupational Health and Safety Policy POL-0012 • Information Communication and Technology Management Policy POL-0010 ○ Social Media Procedure PRO-0024 ○ Privacy Procedure PRO-0021 ○ Talent Consent and Release Form FRM-0006 ○ Use of digital media produced by employees-volunteers FRM-0095 • Diversity and Inclusion Policy POL-0011 ○ Volunteer Management Procedure PRO-0029
--	--

14. Review and Approval

Document reviewed by:

- Executive Team
- Management Team
- Occupational Health and Safety Coordinator
- Senior Occupational Health and Safety Business Partner
- Senior People and Culture Business Partner
- Community Engagement Officer
- Learning Experience Officer
- Volunteer Coordinator

Document Approved by:

- Board Meeting March 2026
Resolution Number 199-2026-B