Child Safe Policy

July 2026

Authorisation

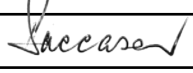
Authorised by	Authorisation date	Effective date	Next Review
Peter Saccasan	7 August 2026	7 August 2026	7 August 2027
			

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1 Purpose

Education Development Association (EDA) is committed to providing a safe, supportive and caring environment that enables children and young people to develop to their full potential as individuals.

The Child Safe Policy (this Policy) is a demonstration of EDA's commitment to protecting children and young people from abuse. This Policy aims to:

- Promote the health, safety and wellbeing of children and young people at EDA.
- Outline EDA's approach to child safety.
- Provide guidance to employees, residents, third parties and volunteers on their child safety responsibilities.
- Embed the Child Safe Standards throughout EDA.

2 Scope

This Policy extends to EDA's child-related activities and programs. It applies to the following individuals:

- Employees
- Residents
- Third parties
- Volunteers.

3 Terms and Definitions

For the purposes of this Policy:

Term	Meaning
CALD	Refers to Culturally and Linguistically Diverse (CALD).
Centre	Refers to a study centre established by EDA in which its educational activities are conducted.
Child	Refers to a person under the age of 18 years, unless under the law applicable to the child, majority is attained earlier.
Child abuse	Refers to the acts or omissions (neglect) that result in, or have the likelihood to result in, harm to a child. The forms of child abuse are sexual abuse, emotional abuse, neglect, physical abuse, and exposure to family violence.
Child Safe Organisation	Refers to an organisation that consciously and systematically creates conditions that reduce the likelihood of harm to children. It creates conditions that increase the likelihood of identifying and reporting harm and responds appropriately to disclosures, allegations, or suspicions of harm.
Child Safeguarding Officer	Refers to the individual appointed by EDA who is responsible for matters relating to child safety, including the management of child safety complaints.
EDA	Refers to Education Development Association.
Employee	Refers to an individual in a paid position at EDA.

Helper	Refers to a person invited to help from time to time in a particular activity at a Centre. A helper may be a person under 18 years or over 18 years of age.
Leader	Refers to an adult who has an ongoing role in the provision of services in a Centre.
The 10 Child Safe Standards	Refers to the Royal Commission's Child Safe Standards. The Child Safe Standards articulate the essential elements of a Child Safe Organisation.
National Principles for Child Safe Organisations	Refers to the national framework to creating Child Safe Organisations. The National Principles for Child Safe Organisations ('National Principles') are a set of 10 principles that provide a nationally consistent framework to help organisations create cultures, systems, and practices that promote child safety and wellbeing.
Officer	Refers to the meaning given by the *Corporations Act 2001* (Cth) and includes a director or secretary of EDA.
Principal	Refers to a person appointed by EDA to direct activities at a Centre.
Resident	Refers to an individual that resides at a Centre and may be engaged to volunteer in child-related activities at EDA.
Third party	Refers to an individual or entity engaged by EDA on a temporary basis, including but not limited to a: ● Contractor ● Tradesperson ● Sub-contractor ● Supplier.
Volunteer	Refers to an individual in an unpaid position at EDA. This includes EDA Officers, Leaders and Helpers, and may include Principals and Residents. It also includes other individuals engaged by EDA on a voluntary basis, such as parent volunteers.
Working with Children Check	Refers to the legislative requirement for individuals to obtain a Working with Children Check (WWCC) clearance to work or volunteer with children. Reference to WWCC also includes Blue Card (QLD), Ochre Card (NT) WWVP (ACT) and RWVP (Tasmania).

4 The Child Safe Standards

This Policy reflects EDA's commitment to embedding the Child Safe Standards throughout the organisation. The Child Safe Standards are as follows:

1. Child safety is embedded in organisational leadership, governance and culture
2. Children participate in decisions affecting them and are taken seriously
3. Families and communities are informed and involved
4. Equity is upheld and diverse needs are taken into account
5. People working with children are suitable and supported
6. Processes to respond to complaints of child abuse are child focused
7. Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training
8. Physical and online environments minimise the opportunity for abuse to occur
9. Implementation of the Standards is continuously reviewed and improved
10. Policies and procedures document how the organisation is child safe.

Refer to **Appendix A: Child Safe Organisations - Legislative and Regulatory Frameworks** for an overview of the relevant legislative and regulatory frameworks in each State and Territory.

5 Statement of Commitment to being a Child Safe Organisation

At EDA, we are committed to the safety and wellbeing of all children that participate in our programs. We have a zero-tolerance approach to child abuse.

Our commitment:

- **Child Rights:** We recognise and promote the rights of children, including their right to express their views and participate in decisions that impact their lives.
- **Public Commitment:** We make information about our child safety approach available on our website and communicate child safety information to relevant stakeholders.
- **Diversity and Inclusion:** We acknowledge and respect the diverse needs of First Nations children, children from CALD backgrounds, and children with disabilities.
- **Safe Recruitment and Engagement:** We adopt robust measures to ensure individuals engaged by EDA are suitable to work or volunteer with children.
- **Training and Education:** We deliver regular child safe training to employees and volunteers to build their capacity and skills in preventing child abuse and keeping children safe.
- **Child Safe Risk Management:** We identify child abuse risks and adopt a situational prevention approach to mitigate risks across our activities and programs.
- **Policies and Procedures:** We implement a Child Safe Policy Framework that addresses the Child Safe Standards and the National Principles.
- **Continuous Improvement:** We conduct regular child safe audits, policy reviews and analysis following any child safety complaint, to continually improve our child safety approach.

6 Child and Youth Participation and Empowerment

EDA is committed to providing an environment where children feel safe and supported to raise their concerns. We provide:

- Age-appropriate information including about:
  - Children's rights to speak up
  - Appropriate and inappropriate behaviours
  - How to raise safety concerns and provide feedback at EDA.
- Programs and activities that are suitable to the age, development, capability and understanding of the children participating.
- Training and support for employees and volunteers on how to empower children and promote their participation.
- Support for children to develop and sustain friendships through EDA's programs which are designed to promote teamwork.

7 Engaging with Parents and Families

We recognise the important role which parents and families have in keeping children safe. We work in partnership with parents and families to ensure they feel confident that their child is safe whilst participating in EDA programs.

We provide parents and families:

- Access to our child safe policies and procedures
- Opportunities to provide feedback to EDA about its activities, programs and child safety approach
- Information about who to speak to and how to raise a child safety concern at EDA.

8 Culturally Safe Environment

We are committed to fostering a culturally safe and inclusive environment where First Nations children and their families feel respected and valued.

At EDA, we:

- Clearly communicate zero tolerance for racism
- Provide environments where children and families feel safe and are encouraged to express their cultural identity
- Support awareness amongst employees and volunteers through the delivery of cultural awareness training
- Identify and address risks to children's cultural safety through risk assessments
- Engage in continuous learning opportunities to ensure EDA builds awareness and understanding across the organisation.

9 Diversity and Inclusion

EDA is committed to protecting the safety, wellbeing and inclusion of all children, including First Nations children, children from culturally and linguistically diverse (CALD) backgrounds, and children with disability.

At EDA, we:

- Provide children and families with access to information about our child safety approach
- Design and deliver programs and activities that are appropriate for children from specific cultural groups and/or children with a disability
- Provide employees and volunteers with regular training on inclusive practices.

10 Recruitment and Engagement

EDA adopts robust recruitment, screening, and induction processes to ensure the most suitable individuals are engaged to work or volunteer with children. For further guidance, refer to EDA's *Child Safe Recruitment Procedure*.

11 Complaints Handling

EDA takes all child safety complaints seriously. We respond to complaints, disclosures, concerns, suspicions, allegations and breaches relating to child safety in accordance with our *Child Safe Complaints Handling Procedure.*

12 Child Safe Legal Obligations

EDA complies with its child safe legal obligations, including but not limited to the following:

- Mandatory reporting
- Failure to report/disclose offence
- Failure to protect offence
- Organisational duty to prevent child abuse
- Reportable conduct.

For guidance refer to our *Child Safe Complaints Handling Procedure*.

13 Risk Management

We adopt a proactive approach to identify, assess and manage risks of child abuse in both the physical and online environments. We complete a child safe risk assessment for all child-related activities and implement preventative measures to mitigate identified risks.

For a comprehensive guide to EDA's child safe risk management approach, please refer to the *Child Safe Risk Management Procedure*.

14 Roles and Responsibilities

Role	Responsibilities

Officers ***(EDA Board Members)***	● Oversee the implementation of EDA's child safe policies and procedures ● Monitor and ensure EDA's compliance with child safety legislation and regulation ● Ensure child safety is a standing agenda item at Board meetings ● Employ and appoint suitable individuals to the role of Principal at each Centre ● Ensure adequate resources are allocated to facilitate the development and implementation of child safe policies and procedures across EDA ● Oversee continuous review and improvement of EDA's child safe policies and procedures.
Safeguarding Committee	● Report to EDA's Board on child safety matters ● Monitor child safety legislative and regulatory updates ● Implement a comprehensive risk management framework that minimises risks of harm to children ● Provide ongoing support to the CSO in meeting their child safe responsibilities ● Ensure complaints are managed in accordance with EDA's *Child Safe Complaints Handling Procedure* ● Oversee the investigation process into child safety complaints ● Conduct child safety complaints reviews and analysis and lead continuous improvement.
Child Safeguarding Officer (CSO)	● Report to the Safeguarding Committee on child safety matters ● Lead the implementation of EDA's child safe policies and procedures ● Receive, respond to and investigate child safety complaints ● Escalate child safety complaints, in accordance with the *Child Safe Complaints Handling Procedure* ● Support Principals to implement EDA's child safe policies and procedures at the Centres ● Maintain EDA's centralised WWCC register, in accordance with legislative requirements ● Provide child safety information and advice to employees, volunteers, residents, children, and families.
Principals ***(Study Centre Directors)***	● Monitor employee and volunteer adherence to EDA's child safe policies and procedures ● Support Leaders/Helpers to meet their child safe responsibilities ● Verify the WWCC clearances of Leaders/Helpers, and third parties if engaged at the Centre ● Escalate child safety complaints in accordance with EDA's *Child Safe Complaints Handling Procedure* ● Complete risk assessments in accordance with EDA's *Child Safe Risk Management Procedure* ● Model appropriate standards of behaviour in accordance with the *Child Safe Code of Conduct* ● Communicate key child safety updates at team meetings ● Ensure the Centre is compliant with its record keeping responsibilities in accordance with S*ection 15* of this Policy.
Employees and Volunteers	● Comply with EDA's child safe policies and procedures ● Report child safety complaints in accordance with the *Child Safe Complaints Handling Procedure* ● Maintain a valid WWCC clearance or equivalent

	● Complete child safe training during induction and on an ongoing basis ● Monitor children for possible signs of abuse ● Respond appropriately to children if they raise a concern ● Identify and manage child safety risks in their areas of responsibility.
Residents	● Comply with EDA's child safe policies and procedures ● Report child safety concerns to the CSO, or another available EDA employee or volunteer.
Third parties	● Comply with EDA's child safe policies and procedures, as applicable to their role / engagement ● When required by law, maintain a current WWCC clearance (or equivalent) ● Report child safety concerns to an available EDA employee or volunteer.

15 Record Keeping

EDA manages child safety records in accordance with the *Privacy Act 1988* (Cth). EDA retains child safety records for a minimum of **7 years** and keeps complete and accurate records related to serious child abuse matters for a period of **45 years.**

EDA ensures that child safety records are:

- Preserved in a suitable physical and/or digital environment where records are not subject to degradation, loss, alteration, corruption or deletion
- Secure from unauthorised access.

16 Information Sharing

EDA may share information that relates to the protection, safety and wellbeing of children with other prescribed bodies, in accordance with relevant State/Territory legislation. For guidance, refer to our *Child Safe Complaints Handling Procedure.*

17 Surveillance and CCTV

Where utilised, EDA adopts the following best practice principles in relation to CCTV:

- CCTV devices are installed for authorised purposes only. Devices are not installed in areas which have view into bathrooms, changing areas or other private spaces.
- CCTV footage is stored for a minimum of 30 days. If there is an incident, footage is stored for an additional period of time for the purpose of police investigation.
- Personal information recorded through CCTV is destroyed and/or de-identified when it is no longer needed.
- Only authorised persons have access to view CCTV footage, with multiple access controls in place such as passwords and authorisation codes.
- CCTV footage is released for authorised purposes only, such as police investigations.

18 Breaches of this Policy

EDA responds promptly to breaches of this Policy. The response is managed in a fair, unbiased, and supportive manner, in accordance with EDA's *Child Safe Complaints Handling Procedure*. Outcomes may include, but are not limited to the following:

- Restriction of employee or volunteer duties
- Providing closer supervision
- Specific education and training
- Mediation between parties
- Disciplinary measures, such as warnings, suspension, or termination
- Termination of contractual arrangement
- Review and update of current policies and procedures.

19 Policy Review

This Policy is reviewed annually, or earlier as required in accordance with legislative and/or regulatory updates.

EDA is committed to promoting the participation of families and children in the development of this Policy. Each Centre makes this Policy available to parents and encourages their feedback and/or suggestions to improve this Policy. Suggestions are taken seriously and considered by EDA.

20 Related Policies and Procedures

This Policy should be read in conjunction with the following related EDA documents:

- *Child Safe Code of Conduct*
- *Child Safe Complaints Handling Procedure*
- *Child Safe Recruitment Procedure*
- *Child Safe Risk Management Procedure*

21 Relevant Legislation

Care and Protection of Children Act 2007 (NT)
Child and Youth Safe Organisations Act 2023 (Tas)
Child Protection Act 1999 (QLD)
Child Protection (Working with Children) Act 2012 (NSW)
Child Safe Organisations Act 2024 (QLD)
Child Safety (Prohibited Persons) Act 2016 (SA)
Child Wellbeing and Safety Act 2005 (Vic)
Children and Community Services Act 2004 (WA)
Children and Young People Act 2008 (ACT)
Children and Young People (Safety) Act 2017 (SA)
Children and Young Persons (Care and Protection) Act 1998 (NSW)
Children's Guardian Act 2019 (NSW)
Children, Young Persons and their Families Act 1997 (Tas)
Children, Youth and Families Act 2005 (Vic)
Civil Liability Act 1936 (SA)
Civil Liability Act 2002 (NSW)
Civil Liability Act 2002 (Tas)

Crimes Act 1900 (ACT)
Crimes Act 1900 (NSW)
Crimes Act 1958 (Vic)
Criminal Code Act 1924 (Tas)
Criminal Code Act 1899 (Qld)
Criminal Law Consolidation Act 1935 (SA)
Human Rights Act 2004 (ACT)
Human Rights Commission Act 2005 (ACT)
Ombudsman Act 1989 (ACT)
Parliamentary Commissioner Act 1971 (WA)
Privacy Act 1988 (Cth)
Registration to Work with Vulnerable People Act 2013 (Tas)
Worker Screening Act 2020 (Vic)
Working with Children (Risk Management and Screening) Act 2000 (Qld)
Working with Children (Screening) Act 2004 (WA)
Working with Vulnerable People (Background Checking) Act 2011 (ACT)
Wrongs Act 1958 (Vic)

22 Version History

Version	Effective From	Amendment	Author(s)	Approved by
1	2 August 2024	-	Child Safeguard	Peter Saccasan
2		● Scope ● National State/Territory legislative and regulatory frameworks ● Cultural safety	Child Safeguard	

Appendix A: Child Safe Organisations – Legislative and Regulatory Frameworks

ACT	
Legislation	*Human Rights Act 2004* (ACT)
Framework	ACT Child Safe Standards
Regulator	ACT Human Rights Commission and other sector regulators
Further Information	• Information for Organisations - HRC • Monitoring and Regulation - HRC
NSW	
Legislation	*Children's Guardian Act 2019* (NSW)
Framework	NSW 10 Child Safe Standards
Regulator	Office of the Children's Guardian (OCG)
Further Information	• Why we have Child Safe Standards | Office of the Children's Guardian (nsw.gov.au) • Implementing the Child Safe Standards | Office of the Children's Guardian (nsw.gov.au)
Queensland	
Legislation	*Child Safe Organisations Act 2024* (QLD)
Framework	10 Child Safe Standards and Universal Principle *(Cultural Safety)*
Regulator	Queensland Family and Child Commission
Further Information	• Child Safe Organisations | Queensland Family and Child Commission
South Australia	
Legislation	*Children and Young People (Safety) Act 2017* (SA)
Framework	The National Principles
Regulator	Department of Human Services
Further Information	• DHS | The National Principles • DHS | Child Safe Environments Program
Tasmania	
Legislation	*Child and Youth Safe Organisations Act 2023* (Tas)
Framework	Child and Youth Safe Standards *(based on the National Principles)*
Regulator	Independent Regulator
Further Information	• Child and Youth Safe Organisations Framework | CARCRU • The Independent Regulator | CARCRU
Victoria	
Legislation	*Child Wellbeing and Safety Act 2005* (Vic)
Framework	Victoria's 11 Child Safe Standards
Regulator	Social Services Regulator (SSR)
Further Information	• Child Safe Standards | vic.gov.au
Western Australia	
Framework	The Ombudsman WA has commenced work to implement an oversight scheme in WA, build organisational capability, monitor, and enforce compliance with the National Principles for Child Safe Organisations.
Regulator	Ombudsman WA
Further Information	• Child Safe Organisations WA • New scheme to strengthen safety for WA children | Western Australian Government

Appendix B: Identifying the Forms and Possible Signs of Abuse

Child abuse refers to acts or omissions (neglect) that result in, or have the likelihood to result in, harm to a child. There are two different signs of abuse, physical and behavioural. A person should not assess individual signs in isolation, rather signs should be looked at in the context of other potential signs and the personal circumstances or history of the child.

- **Physical signs** are the injuries / visible harms that may occur as a result of abuse.
- **Behavioural signs** are the actions, attitudes, and emotions of an individual that indicate abuse may have occurred.

The signs of abuse noted below are not exhaustive. The presence of these signs does not necessarily mean that abuse has been, or is, occurring.

1. Physical Abuse

Definition: Refers to the use of deliberate physical force against a child that intentionally or unintentionally results, or has the likelihood of resulting, in harm.

Possible Physical signs	Possible Behavioural signs
• Bruising • Fractured bones • Burns / scalds • Lacerations and welts • Sprains and dislocations	• Covering up injuries • Fear of adults • Unable to explain an injury • Being aggressive towards others • Avoiding physical contact

2. Emotional/Psychological Abuse

Definition: Refers to inappropriate verbal or symbolic acts by an adult towards a child and/or a persistent failure over time to provide a child with adequate nurturing and emotional availability.

Possible Physical signs	Possible Behavioural signs
• Physical development is delayed • Delayed speech • Bed-wetting beyond usual age • Extreme weight loss • Signs of self-harm	• Overly compliant behaviour • High levels of anxiety or depression • Avoids interaction with other children • Demonstrating low self-esteem • Extreme attention seeking behaviour

3. Sexual Abuse

Definition: Refers to when a person exposes a child to or involves a child in, sexual activity that the child does not fully comprehend, the child is unable to give informed consent to, the child is not developmentally prepared for and that is contrary to acceptable community standards.

Possible Physical signs	Possible Behavioural signs
• Pain or bleeding in anal or genital areas • Bruises and/or bite marks to breasts, buttocks, lower abdomen • Difficulty walking or sitting	• Sexual behaviour beyond healthy development • Self-destructive behaviour • Regression in development

4. Child Grooming

Definition: Child grooming is a form of sexual abuse. It refers to actions deliberately undertaken with the aim of befriending and establishing an emotional connection with a child, to lower the child's inhibitions in preparation for sexual activity with the child.

Possible Grooming Strategies
• Using favouritism, bribes and/or giving gifts to a child • Spending inappropriate one-on-one time with a child • Actively isolating children from other adults or children • Violating personal boundaries in the context of intimate care, e.g. toileting and changing clothes • Insisting on physical affection e.g. kissing, tickling even when a child does not appear to want it • Communicating privately with a child via social media • Forming relationships with parents and family members of children in order to build trust and ease their ability to access the child.

5. Neglect

Definition: Refers to the failure to provide a child with conditions that are culturally accepted as being essential for their growth, development and wellbeing, such as health, education, emotional development, nutrition, shelter and safe living conditions. Neglectful behaviours are an act of omission or by wilful choice.

Possible Physical signs	Possible Behavioural signs
• Low weight for age • Poor standards of hygiene • Untreated physical problems • Poor complexion	• Stealing food • Indiscriminately seeks out adult affection • Being constantly tired • Frequently late or absent

6. Exposure to Family Violence

Definition: Refers to any form of abusive behaviour by a person towards another family member. The abuse can be physical, sexual, emotional, psychological, economical, threatening, or coercive type behaviour. It is also a form of abuse when a child is exposed to, hears or witnesses any of the effects of the abusive behaviours.

Possible Physical signs	Possible Behavioural signs
• Speech disorders • Delays in physical development • Physical symptoms such as headaches and stomach aches • Being easily startled • Injuries as a result of harm	• Behavioural signs may include: • Fear of and avoiding going home • Depression, anxiety, or suicidal thoughts • Violent or aggressive behaviour and language • Demonstrated fear of parents