

Child Safety

CCSW.PO.05 Child Safety and Wellbeing Policy

Our Commitment to Child Safety

Settlement Services International Limited and its subsidiary entities' (SSI Group's) Child Safety and Wellbeing Policy demonstrates our commitment to the rights of children and young people and their safety. We are committed to providing a positive and safe experience to all children and young people that engage with any service or activity delivered by SSI Group.

Everyone at SSI Group is committed to actively safeguarding children and young people¹. We understand that any form of abuse, and/or neglect can cause long lasting effects on children's ability to reach their potential.

We are committed to protecting children and young people from harm and providing a safe environment for them. We are focused on the safety and wellbeing of all children and young people, including those from all faiths and cultural backgrounds. We are committed to safeguarding children and young people who are linguistically diverse including those who speak different languages, and those who use alternative forms of communication including Australian Sign Language (Auslan). We act as allies and a foundational support for children and young people who identify as gender and sexually diverse (LGBTIAQ+), and those living with a disability. We will ensure the cultural safety of the Aboriginal and Torres Strait Islander children, while recognising the resilience and strength of their communities and shared history.

We have zero tolerance for any form of harm, abuse, neglect, exploitation, discrimination, or violence, and have systems in place to hold each other accountable to protect the rights of children and young people.

We will act in the best interests of the child and champion their rights, meeting our obligations under the United Nations Convention on the Rights of the Child (**UNCRC**) and the Child Safe Standards recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse and align with the Australian Human Rights Commission, National Principles for Child Safe Organisations and relevant state/territory Child Safe Standards.

¹ VIC – child 0–12 years, young person 12–18 years | NSW child 0–16 years, young person 16–18 years | QLD child 0–18 years.

We ensure children and young people's safety and wellbeing is embedded in the everyday thinking and practice of everyone at SSI Group, whether they interact directly or indirectly with children and young people.

We are committed to listening to children and young people and amplifying their voices, creating a culture of safeguarding and striving to do better. We work to actively collaborate and support the genuine participation of children and young people in decision making regarding their goals and needs and other matters affecting them.

Purpose

The Child Safety and Wellbeing Policy describes the principles, requirements and core processes for SSI Group to support the continuous development of a child safe culture. This policy provides guidance to the entire SSI Group workforce to adopt strategies and take action to promote the safeguarding of children and young people, to prevent harm occurring and provide a child safe environment across all locations, programs, and activities.

SSI Group has zero tolerance for child abuse, harm, neglect and exploitation. All children and young people, regardless of their gender, race, culture, religious beliefs, age, disability, sexual orientation, gender expression or family and social background, have equal rights to be safe from harm.

Everyone working at SSI Group, including volunteers and students, is responsible for the safety and wellbeing of the children and young people who have contact with our services and activities, whether they work directly with children or not, and is responsible for reporting suspected child abuse, harm, and neglect.

Scope

This policy applies to all SSI Group staff, volunteers, students, members of the Board and sub-contractors, whether they have direct contact with children and young people or not. It also applies to authorised carers and household members that reside on the authorised carer's property.

It covers all children and young people who engage with SSI Group, with children being defined as those aged 0-18 years of age.

Principles

Whilst SSI Group works to maintain a child or young person's connection to culture, language, faith and sense of identity, it is important to note that child safety and wellbeing is paramount.

SSI Group adheres to the [National Principles for Child Safe Organisations](#) and its legal obligations in child safety and wellbeing as stipulated by the jurisdictions in which it operates.

SSI Group is committed to upholding the United Nations Convention on the Rights of the Child (**UNCRC**) through:

- Recognising that it is everyone's responsibility to ensure a child safe environment, including staff, Board, management, carers, volunteers, students, sub-contractors, and families of children and young people and authorised carers and those in their household. (National Principle 1)
- Understanding that all children and young people are vulnerable. The safety, welfare and wellbeing of children and young people are at the centre of SSI Group's planning, actions, and decisions, putting their needs and interests ahead of the agencies involved, and the adults around them. (National Principles 1 and 9)
- Recognising the increased vulnerability of children and young people from culturally and linguistically diverse backgrounds, Aboriginal and Torres Strait Islander children, LGBTIQ+ children, those who are unable to live with their birth families, or at home, and children living with disability. (National Principle 4)
- Promoting the active involvement of children, young people and families and relevant stakeholders such as carers or community members in making decisions about their lives and the services they need. SSI recognises that children and young people are the experts on their own lives and have a right to provide input on decisions that affect them. SSI actively seeks guidance from children and young people about how to improve SSI services and activities. This is fundamental to SSI Group's person-centred approach. (National Principles 2, 3 and 9)
- Implementing rigorous recruitment, screening and selection practices of staff, volunteers, and carers consistent and in keeping with legislative requirements. (National Principle 5)
- Ensuring staff, carers, volunteers and students receive ongoing training and support about child safety, wellbeing and related risks and cultural awareness training including First Nations culture and history. (National Principle 7)
- Prioritising culturally sensitive relationships and practices between children, young people, family, carers, community members, friends and professionals and other stakeholders in a child or young person's life. (National Principle 4)
- Maintaining our duty of care to the safeguarding and wellbeing of children and young people through agency collaboration (State, Federal and associated services), strategic planning, policies and practice. (National Principles 1, 9 and 10)
- Ensuring that child safety and wellbeing incidents, allegations and complaints are responded to, and reported, consistent with state legislation and contractual reporting requirements. Incidents are managed in a timely and effective manner whilst adhering to privacy requirements and ensuring appropriate support is provided to all parties. (National Principle 6)
- Actively providing and maintaining safe physical and online environments for all children and young people that interact with SSI Group. (National Principle 8)

Core Processes

SSI Group's processes and procedures regarding child safety and wellbeing are designed to put in place strategies for:

- **Prevention** – through rigorous staff recruitment, including of volunteers and students, as well as paid members of staff, our code of conduct, staff training, clear definitions of appropriate and inappropriate behaviour, the supervision and active monitoring of staff, providing information to families and raising community awareness.
 - SSI Group staff, students and volunteers undergo police, reference and Working with Children Checks (WWCC) or equivalent, at the time of recruitment and are required to maintain, at a minimum, a valid WWCC in the state where they work.
 - SSI Group staff, including volunteers and students, are trained in child safeguarding practices, identifying, and responding appropriately to signs and allegations of harm. Staff are aware of, and sensitive to, culturally and linguistically diverse backgrounds, cultural practices, LGBTIQ+ children and young people, and children and young people with disabilities, without deviating from SSI Group's policies and procedures.
- **Cultural safety** – SSI Group is committed to the cultural safety of all children and young people. SSI Group understands the importance of culture to the wellbeing and safety of CALD and Aboriginal and Torres Strait Islander children and young people and engages with an Aboriginal Peak Body or business to provide cultural awareness training to all staff. SSI Group acknowledges the additional risks associated with intersectionality, such as being from a culturally diverse background *and* identifying as LGBTIQ+, and the need for further safeguarding with children and young people experiencing added layers of vulnerability.
- **Participation** – SSI Group will seek the opinions of children and young people in the development of child safety and wellbeing policies and invite children to express their views and opinions on relevant SSI Group policies and procedures, as well as matters that directly impact their lives.
- **Practice standards** – through further development of safeguarding standards across SSI Group, as well as the ongoing implementation of SSI Group's trauma informed practice standards. This includes preventing exposure to traumatic events or stressors, consideration of SSI Group's physical environment and ways in which to limit vicarious trauma.
- **Reporting and receiving allegations** – through the requirement that all staff, students and volunteers at SSI Group are mandatory reporters and by providing several mechanisms for children, young people, and their families to raise concerns, including child friendly resources. Staff, volunteers and students are directed to read the relevant Child Protection Procedure and Reportable Conduct Procedure for their State for more information
- **Investigating** – including making a finding, what the outcome of investigation may be, providing support to children and young people and all other parties involved, and maintaining confidentiality throughout.

- **Risk management** – through annual child safe risk assessments and strategies to mitigate the risk of harm across the organisation, including initial and ongoing individual risk assessments, and evaluation of risk at the conclusion of an investigation.
- **Quality and audit** – through comprehensive documentation of policies and procedures and complete and accurate record keeping and exchange of information – in accordance with relevant Federal and State legislation.

Roles and Responsibilities

Role	Scope	Child Safety Responsibilities
SSI Group Board	SSI Group, all states	• Duty of care – to take reasonable care to prevent harm, abuse and neglect from occurring to the children and young people that interact with SSI Group’s programs and activities, whether directly as a client or indirectly. • Legal obligations – to ensure SSI Group is complying with its legal obligations and duty of care. • Culture and Purpose – to create and promote a child safe culture at SSI Group.
Program Managers/ Leaders	SSI Group, all states	• Duty of care – to take reasonable care to prevent harm, abuse and neglect from occurring to the children and young people that interact with SSI Group’s programs and activities, whether directly as a client or indirectly. • Ensure they are proficient in safeguarding children and young people. • Remain up to date on relevant child safe principles and standards and how they apply to SSI Group services. • Ensure team members are informed and trained in child safety and wellbeing. • Create, promote and lead a child safe culture at SSI Group.
All SSI Group staff, students and volunteers	SSI Group, all states	• Work proactively to ensure that SSI Group provides a safe environment for children and young people. • Stay informed about child safety and wellbeing. • Discharge their duties as mandatory reporters. • Adhere to child safe practices. • Comply with applicable child protection legislation.
Head of Relevant Entity (HRE) – also known as Head of Organisation (HO) in Victoria	SSI Group, all states	• Maintain proper systems for preventing, detecting and responding to reportable allegations or convictions. • Notify the relevant authority • NSW – Office of the Children’s Guardian • VIC – Commission for Children and Young People (CCYP) • Child Safety in the QLD Department of Children, Youth Justice and Multicultural Affairs

Role	Scope	Child Safety Responsibilities
Investigation & Compliance Officer	SSI Group, all states	- Delegated HRE responsibilities under the Reportable Conduct Scheme - Assess allegations, risk, conduct investigations and report findings and recommendations.
Principal Officer (PO)	Out of Home Care, NSW SSI Group, all states	- Authorise and deauthorise foster carers - Approve restricted practice & psychotropic medication - Report specific client incidents to the relevant authority
General Manager (GM) Children, Families & Disability Support	SSI Group, all states	Lead Safeguarding Risk Committee
Safeguarding Children & Young People Working Group	SSI Group, all states	- A standing, child safe committee with permanent membership that is representative of SSI Group-wide safeguarding responsibilities - Meets regularly and identifies safeguarding concerns across SSI Group programs to be taken to Safeguarding Risk Committee for review and resolution - Undertakes tasks to address action points arising from Child Safety Roadmap to progress SSI Group as a Child Safe Organisation
Safeguarding Risk Committee	SSI Group, all states	- Reviews all risks pertaining to the safeguarding of children and young people at SSI Group - Provides input to SSI Group's governance structure and reporting, as well as annual risk assessment - Reports to Risk & Compliance Committee

Delegations of Authority

Role	SSI Group Role	Delegation of Authority to
Head of Relevant Entity (HRE) – also known as Head of Organisation (HO) in Victoria	CEO	General Manager, Corporate Services
Principal Officer (PO)	CEO	General Manager (GM) Children, Families & Disability Support

Relevant legislation

Family Law Act 1975 (Cth)
 Children and Young Persons (Care and Protection) Act 1998 (NSW)
 Crimes Act 1900 (NSW)
 Ombudsman Act 1974 (NSW)
 Child Protection Act 1999 (QLD)
 Education (General Provisions) Act 2006 (Qld)
 Crimes Act 1958 (Vic)
 Children, Youth and Families Act 2005 (Vic)
 Child Wellbeing and Safety Act 2005 (Vic)
 Commission for Children and Young People Act 2012
 Children Legislation Amendment (Reportable Conduct) Act 2017
 Child Safe Organisations Bill 2024 (QLD)

Definitions

Term	Definition
Bullying	Bullying is when people repeatedly and intentionally use words or actions against someone or a group of people to cause distress and risk to their wellbeing. These actions are usually done by people who have more influence or power over someone else, or who want to make someone else feel less powerful or helpless.
Child abuse	Child abuse refers to all forms of physical and/or emotional ill treatment, sexual abuse, neglect or exploitation of a child or young person resulting in actual or potential harm to the child or young person's health, survival, development or dignity in the context of a relationship with a person of responsibility, trust or power.
Child or young person	A person under the age of 18 years.
Discrimination	Discrimination refers to the treatment or proposing to treat someone less favourably than someone else because of a particular characteristic or attribute in the same or similar circumstances. Discrimination can be direct or indirect.
Emotional or Psychological abuse	Emotional or psychological abuse refers to isolated or persistent emotional maltreatment that impacts on a child's emotional, psychological and social development. Such abuse may involve repeated rejection or threats to a child, as well as constant criticism, teasing, ignoring, threatening, yelling, scapegoating, ridiculing, or continual coldness towards a child or young person.
Domestic and Family violence	Domestic and Family violence is any threatening, coercive or abusive behaviour that occurs between family members or intimate and domestic partners, that causes fear in the person experiencing the behaviour.

Term	Definition
	Family violence occurs when children live in a home where there is violence between adults. It can include witnessing violence or the consequences of violence, including witnessing verbal abuse, physical violence or psychological violence between two adults. Family violence is defined as violence between members of a family or extended family or those fulfilling the role of the family in a child or young person's life. Exposure to family violence places children and young people at increased risk of physical injury and harm and has a significant impact on their wellbeing and development.
Grooming	Grooming is a term used to describe what happens when a perpetrator builds a relationship with a child with the goal to abuse them. It involves predatory behaviour designed to facilitate sexual activity with a child and has no set pattern of behaviour. Perpetrators purposely create relationships with children, their families or carers to create a situation where abuse could occur. A child may be given special attention with normal displays of affection such as cuddling may develop into sexual touching and then into more serious sexual behaviour.
Harm	Harm is any detrimental effect of a significant nature on a child or young person's physical, psychological or emotional wellbeing. Harm can be caused by: • physical, psychological, racial, emotional abuse or neglect • sexual abuse or exploitation • a single act, or inaction, omission, or circumstance and • a series or combination of acts, omissions, or circumstances.
Neglect	Neglect is the persistent failure or deliberate denial to provide a child or young person with the necessities of life. Such neglect includes the failure to provide adequate food, clothing, shelter, adequate supervision, clean water, medical attention or supervision to the extent that a child's health and development are, or are likely to be, significantly harmed. Categories of neglect include physical neglect, medical neglect, abandonment or desertion, emotional neglect and educational neglect. It applies where the adult understood the needs of the child and had the opportunity to meet those needs but failed to do so. Neglect must be considered within the context of resources reasonably available.
Physical abuse	Physical violence is the intentional, non-accidental or reckless use of physical force against, with, or in the presence of a child, which has the ability to cause injury or harm to the child. The abuser may inflict an injury intentionally or inadvertently because of physical punishment or the aggressive treatment of a child or young person.

Term	Definition
	Physical abuse includes shoving, hitting, slapping, shaking, throwing, punching, biting, burning and kicking, as well as giving children or young people harmful substances such as drugs, alcohol or poison.
Sexual abuse	Sexual abuse is any interaction between an adult and a child that involves any sexual activity. Sexual abuse can include both touching and non-touching behaviours. Perpetrators take advantage of their power, authority or position over a child or young person for the perpetrator's benefit. It can include making sexual comments to a child, engaging children to participate in sexual conversations including over the internet or social media, intimate kissing, any sexual touching of, or by, a child and any sexual acts with a child. Encouraging a child a child to view pornography is also sexual abuse.
Sexual offence	A sexual offence is an offence of a sexual nature under a law of NSW, another state/territory, or the Commonwealth, committed against, with or in the presence of a child, such as: • sexual touching of a child • a child grooming offence • production, dissemination or possession of child abuse material • Forcing a child to participate in sexual activities that are recorded for the purpose of producing pornographic material.
Sexual misconduct	Any conduct with, towards or in the presence of a child that is sexual in nature (but is not a sexual offence) and provides the following (non-exhaustive) examples: • descriptions of sexual acts without a legitimate reason to provide the descriptions • sexual comments, conversations or communications • comments to a child that express a desire to act in a sexual manner towards the child, or another child.
SSI Group	Refers to Settlement Services International Limited and its subsidiary entities: • Access Community Services Limited • Access Community Enterprises Limited • Brisbane Multicultural Arts Centre Limited • Multicultural Centre for Mental Health & Well Being Limited • SSI Legal Pty Ltd.
Staff	For the purposes of this policy, staff refers to all people engaged with SSI Group, whether in a paid or unpaid capacity. This includes members of the Board, students, volunteers and contractors.

Related documents

Related Policies/Procedures

Document code	Document title
CCSW.PR.05.1	Child Protection Procedure (NSW)
CCSW.PR.05.2	Child Protection Procedure (VIC)
CCSW.PR.05.3	Child Protection Procedure (QLD)
CPAC.PO.01	Code of Conduct Policy
CPAC.PR.11	Employment Checks Procedure
CRSK.PR.01	Risk Management Framework
Intranet	<u>SSI Reconciliation Action Plan</u>

Related Forms

Document code	Document title
CCIM.FM.08.01	Client Incident Report Form

Other resources

[SNAICC, National Framework for Protecting Australia's Children 2021-2031](#)
[Commonwealth Child Safe Framework](#)
[National Principles for Child Safe Organisations](#)
[Victorian Child Safe Standards](#)
[NSW Child Safe Standards](#)

Version History

Version	Created	Author	Description
1	28 February 2014	Quality Manager	First draft approved for implementation
2	24 March 2016	P&P Project Manager	Major review to include expanded purpose and scope and strengthen wording around SSI's commitment to child safety
2.1	25 February 2016	P&P Project Manager	Change of ownership from Business Development Manager to COO
3	10 March 2016	P&P Project Manager	Moved from Stakeholder Relationship Manual to PAC Manual

Version	Created	Author	Description
4	18 July 2017	P&P Project Manager	Major review to move policy from PAC to Service Delivery & Support (SDS), include roles and responsibilities and create policy statement
4.1	30 January 2018	P&P Project Manager	Changed Dept of Immigration and Border Protection to Dept of Home Affairs
4.2	14 March 2019	Investigations & Compliance Officer	Updated to include reference to NSW Crimes Act 1990 and Victims' Rights Act 1996 and changed Principal Officer to Head of Agency
5	14 April 2020	P&P Project Manager	Changed FACS to DCJ throughout and include reference to Children's Guardian Act 2019
5.1	20 August 2020	P&P Project Manager	Removed abbreviation DHA and updated Risk Management document coding
6	8 April 2021	Quality & Compliance Team	Updated to include all relevant legislation, reference SSI Group and co-brand with Access
7	22 June 2022	Enterprise Risk Coordinator	Updated as part of a review by the Child Safety Working Group to implement the National Principles of Child Safe Organisations in consultation with the Head of MCFP in NSW. - Version sent to SSI Executives for their review. Approved by CEO on 18 May 2022 Minor updates to clarify terminology about sub-contractors resulting from comments from the Risk and Compliance Committee - Approved by the SSI Group Board on 23 June 2022
7.1	19 June 2024	GM Children Families & Disability Support	Minor update as per Risk & Compliance Committee request to include mention of UN Conventions of the Rights of the Child and CALD children. Board approved 27 June 2024

Version	Created	Author	Description
8	29 November 2024	GM Children Families & Disability Support	Updates throughout to include: • Specific mention of volunteers and students • Responsibilities of program managers/ leaders, safeguarding working group and safeguarding risk committee, and • Table of definitions. Board approved 29 November 2024