



# CHILD SAFE ENVIRONMENTS POLICY

Version 3.0

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## 1.0 Purpose

The safety and wellbeing of children is paramount for Playgroup SA (PGSA) when delivering and supporting programs and services. This policy informs PGSA Board Members, staff, contractors, students and volunteers (“Workers”) of the organisation’s expectations and requirements around the safety and wellbeing of children.

This policy aims to ensure that:

- All Workers understand their responsibilities in relation to the protection of children attending PGSA playgroups.
- All Workers know the appropriate action to take if they have concerns that a child has been harmed or is at risk of harm.

## 2.0 Scope

Child safety is embedded in organisational leadership, governance and culture and documented in policies and procedures which provide the foundation for Playgroup SA to be recognised as a child safe organisation.

This policy provides clear advice to PGSA Workers for the establishment of positive, safe and respectful relationships with children and young people in education and care settings.

This policy applies to all PGSA Workers. Application is mandatory. Workers are required to agree in writing to accept and act in accordance with this policy.

## 3.0 Definitions / Glossary

For the purposes of this document, the following definitions apply:

Term	Definition
Adult (legal definition)	A person who is not a child. <a href="#"><i>s64 Criminal Law Consolidation Act 1935</i></a>



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Term	Definition
Child Abuse Report Line (CARL)	Operated by the Department for Child Protection (DCP), this is a 24-hour service for all notifications of child abuse, harm and risk of harm, which can be made by calling 131478 or via the <a href="#">online reporting system</a> .
Child focussed	Protecting or promoting children's safety and wellbeing and ensuring that they are heard in situations that directly affect them.
Child or young person (legal definition)	A person who is under 18 years of age. <a href="#">s16(1) Children and Young People (Safety) Act 2017</a>
Guardian (legal definition)	The guardian or guardians of the child or young person pursuant to an order of the Court under the Act. <a href="#">s16 Children and Young People (Safety) Act 2017</a>
Harm and/or Risk of Harm (legal definition)	Physical harm or psychological harm (whether caused by an act or omission) including harm caused by sexual, physical, mental or emotional abuse or neglect. Psychological harm does not include emotional reactions such as distress, grief, fear or anger that are a response to the ordinary vicissitudes of life. <a href="#">s17 Children and Young People (Safety) Act 2017</a>
Mandated reporter/notifier	Workers who are legally required to report reasonable suspicion of risk of harm to a child or young person, including prescribed health practitioners, social workers, and staff of, or volunteers in, an organisation that provides health, welfare, education, sporting or recreational, child care, residential services wholly or partly for children and young people, and who provide services directly to children and young people or hold a management position which includes direct responsibility for, or direct supervision of, the provision of services to children and young people.  In the context of PGSA, all Workers (except Board Members) are mandated reporters.
National Principles for Child Safe Organisations	The National Principles for Child Safe Organisations as endorsed in February 2019 by the Prime Minister and state and territory First Ministers according to the National Office for Child Safety.
Parent (legal definition)	Includes:- a) A step-parent of the child or young person; and b) A person who stands in loco parentis to the child or young person; <a href="#">s16 Children and Young People (Safety) Act 2017</a>



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PGSA	Playgroup South Australia and all of its Board Members, staff, students and volunteers.
Reasonable suspicion	Must be based on facts, for example, disclosure of harm or risk of harm.
Workers	PGSA Board Members, staff, contractors, students and volunteers.
Working With Children Checks	People working or volunteering with children in South Australia must, by law, have a Working with Children Check. It is a requirement for persons within paid or voluntary roles, where it is foreseeable that they will work with children, to have a current Working with Children check.

## 4.0 Policy Principles

As an organisation committed to zero tolerance to child harm or risk of harm, PGSA demonstrates the following in all areas of service delivery:

- A duty of care to children, taking reasonable steps to keep them safe from harm and provide a safe environment.
- A commitment to the safety of children with a disability, Aboriginal and Torres Strait Islander children and to the cultural safety of children from Culturally and Linguistically Diverse (CALD) backgrounds.
- Respect towards different cultural traditions and child rearing practices while keeping them safe.
- An emphasis that it is everyone's responsibility to ensure a child safe environment, including staff, Board, management, volunteers, contractors, and families of children.
- Organisational values that demonstrate respect of children when developing child safe policies and procedures, by considering how policies and procedures may affect children who are unable to communicate thoughts and feelings, whether that be due to age or other factors affecting communication.
- Taking every concern and allegation seriously, in line with the principles of procedural fairness; and
- Believing children when they raise a concern or make an allegation.



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## 4.1 Commitment to the Safety of Children and Young People

PGSA demonstrates its commitment to the safety of children and young people by:

- Following the *National Principles for Child Safe Organisations* as stated in Clause 4.2.
- Ensuring this policy complies with the *Children and Young People (Safety) Act 2017*, *Child Safety (Prohibited Persons) Act 2016* and aligns with the *National Principles for Child Safe Organisations*.
- Reinforcing to Workers through this policy and supporting documents that:
  - Bullying and harassment will not be tolerated.
  - All children and young people are valued and respected.
  - All children and young people are embraced regardless of their abilities, sex, gender, or social economic or cultural background and equity is upheld.
  - A child safe culture is championed and modelled at all levels of PGSA.

## 4.2 National Principles for Child Safe Organisations

These 10 principles provide a nationally consistent approach to creating organisational cultures and practices that prioritise child safety and wellbeing.

- **Principle 1.** Child safety and wellbeing is embedded in organisational leadership, governance and culture.
- **Principle 2.** Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.
- **Principle 3.** Families and communities are informed and involved in promoting child safety and wellbeing.
- **Principle 4.** Equity is upheld and diverse needs respected in policy and practice.
- **Principle 5.** People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
- **Principle 6.** Processes to respond to complaints and concerns are child focussed.



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- **Principle 7.** Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
- **Principle 8.** Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
- **Principle 9.** Implementation of the national child safe principles is regularly reviewed and improved.
- **Principle 10.** Policies and procedures document how the organisation is safe for children and young people.

## 4.3 Communication

In keeping with National Principles 2 and 3, PGSA will ensure:

- This Child Safe Environments Policy and related documents are available on the PGSA website. The website link is communicated to new playgroups and families when they register.
- This Child Safe Environments Policy and related documents are provided to all Workers as part of their induction following recruitment.
- The views of children and young people are encouraged and respected, and PGSA will involve them in decision making as appropriate.
- PGSA provides clear age-appropriate or developmentally appropriate explanations to children and young people including their right to safety, their right to be listened to and that they can provide feedback or make a complaint if they have a concern, to any Worker or ask their parent/guardian to do this on their behalf.
- PGSA listens to and acts upon any complaints or concerns that a child or young person raises with us.

## 4.4 Code of Conduct (Child Safe)

In keeping with National Principles 4 and 6, PGSA has behavioural expectations of its Workers when working with children and young people. Caring for children and young people brings additional responsibilities for PGSA Workers. All Workers are responsible for promoting and protecting the safety and wellbeing of children and young people.



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PGSA has a Child Safe Code of Conduct that should be read in conjunction with this Policy. The Code of Conduct applies to all PGSA Workers. Application is mandatory. Workers are required to agree in writing to accept and act in accordance with the Code of Conduct. A selection of requirements follow.

Workers must:

- Follow PGSA's Child Safe Environments policy at all times and take all reasonable steps to ensure the safety and protection of children and young people.
- Treat everyone including those of different race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes and religious beliefs with respect and honesty and ensure equity is upheld.
- Be a positive role model to children and young people in all conduct with them.
- Set clear boundaries and maintain appropriate behaviours with children and young people – boundaries help everyone to understand their roles.
- Listen and respond appropriately to the views and concerns of children and young people.
- Be alert to bullying behaviours and respond promptly and appropriately.
- Ensure another adult is always present or in sight when conducting one to one consulting, coaching, instruction or other activity.
- Be alert to children and young people who have been harmed, or may be at risk of harm and report this quickly to the Child Abuse Report Line (13 14 78).
- Respond quickly, fairly and transparently to any complaints made by a child, young person or their parent/guardian.
- Encourage children and young people to 'have a say' on issues that are important to them.

Workers must not:

- Engage in rough physical games.
- Develop any 'special' relationships with children and young people that could be seen as favouritism such as the offering of gifts or special treatment.



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- Do things of a personal nature that a child or young person can do for themselves, such as toileting or changing clothes.
- Discriminate against any child or young person because of age, gender, cultural background, religion, vulnerability or sexuality.

Breaches or suspected breaches of the Code of Conduct should be reported as soon as practicable to management either in person, or by:

- Telephone on (08) 8344 2722 or
- Email at [info@playgroupsa.com.au](mailto:info@playgroupsa.com.au)

Breaches or suspected breaches of the Code of Conduct will be taken seriously and dealt with quickly, fairly and transparently. Any Worker who breaches the Code of Conduct will face disciplinary action and depending on severity of the breach, the Worker may have their engagement with PGSA terminated.

## 4.5 Recruitment

In keeping with National Principle 5, PGSA ensures it engages the most suitable people to work with children and young people by having the following recruitment practices in place:

- PGSA commitment to child safety is included in all job advertisements.
- Clear position descriptions that include PGSA commitment to child safety and wellbeing.
- Face-to-face interviews that use behavioural questions to determine the applicant's knowledge of child safeguarding.
- At least 2 referee checks and qualification checks.

In accordance with the Child Safety (Prohibited Persons) Act 2016, PGSA is registered with the DHS Screening Unit and links all Working with Children Checks (WWCC) to its registration.

Board Members, senior management and all Workers over the age of 14 years who will be working in a role with children and young people must hold a current, not prohibited WWCC issued by the Screening Unit of the Department of Human Services, provide evidence of this prior to commencing employment and/or voluntary work or studies and renew this every 5 years. PGSA will verify the accuracy of all WWCCs in the DHS Screening Unit portal as required by law. The cost of application for WWCCs is to be covered by the Worker (free for Volunteers). PGSA covers the cost for ongoing WWCCs for existing employees.



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PGSA will immediately contact the Department of Human Services Screening Unit when it becomes aware of assessable information regarding any person involved with PGSA, including any serious criminal offence, child protection information, or disciplinary or misconduct information.

## 4.6 Training, Supervision and Support for Workers

In keeping with National Principles 5 and 7, PGSA has strategies in place to supervise, train and support Workers to understand PGSA's Child Safe Environments policy and associated documents, their mandatory reporting obligations, how to build culturally safe environments and their responsibilities to create a child safe and friendly environment. PGSA strategies include:

- Training:
  - As part of their induction, ensure all Workers (except Board Members) read and understand the Mandatory Reporting Information Booklet available at:  
[https://dhs.sa.gov.au/\\_data/assets/pdf\\_file/0004/166756/CSE-Mandatory-reporting-information-book.PDF](https://dhs.sa.gov.au/_data/assets/pdf_file/0004/166756/CSE-Mandatory-reporting-information-book.PDF)
  - Complete 'Safe Environments Through Their Eyes' training every 3 years (optional for Board Members)
  - Complete relevant modules of the Child Safe Organisations National Principles training (Board Members only)
- Supervision:
  - Regular supervision sessions that include a focus on child safety and wellbeing.
- Support:
  - An induction process for all new Workers including a copy of this policy document.
  - Regular performance appraisals that discuss child safeguarding.
  - Appointing a Child Safety Officer who has an educative role within PGSA.

## 4.7 Reporting and Responding to Harm or Risk of Harm

In keeping with National Principle 6, PGSA will:

- Aim to ensure that children and young people are safe from harm and risk of harm. Section 17 of the Safety Act defines 'harm' to mean physical or



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psychological harm (whether caused by an act or omission), including harm caused by sexual, physical, mental or emotional abuse or neglect.

- Take the following approach to reporting and responding to harm or risk of harm:
  - Make its mandated reporters aware of their legal obligation to report direct to the Child Abuse Report Line (CARL) on 13 14 78 as soon as practicable if they have a suspicion that a child or young person has been harmed or may be at risk of harm. If the child or young person is at immediate risk, report to South Australia Police (SAPOL) on 000 (triple zero).
  - All PGSA Workers (except Board Members) are mandated reporters.
  - Even if not a mandated reporter, any person can report harm or risk of harm to a child or young person. The non-mandated reporter who identifies the harm or risk of harm is encouraged to make the report to authorities and can request the support from another worker to do so if required.
  - Information about making appropriate reports of harm or risk of harm is available from the South Australian Department for Child Protection website: <https://www.childprotection.sa.gov.au/report-suspected-harm>.
  - All adult Workers (even if not a mandated reporter) have a legal obligation to report child sexual abuse by another Worker to the police and to protect a child from sexual abuse by another Worker. Failure to meet these obligations may be considered a criminal offence.
  - Following a report being made to CARL or SAPOL, Workers must make an internal report to management. PGSA will be guided by the Department for Child Protection and/or SAPOL after a report has been made as to whether PGSA can conduct an internal investigation.
  - If a Worker is reported to CARL or SAPOL for causing harm or risk of harm to a child or young person, they will be removed from any role that involves working with any child or young person until authorities have concluded their investigation.
  - Following a report to CARL or SAPOL, PGSA will support the child or young person by:



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- referring the child, young person or their family to other appropriate services.
- continuing to provide a service to the child, young person and their family and monitor their circumstances.
- PGSA will document all information received regarding the report and store this securely in a separate file.

## 4.8 Reporting and Responding to General Complaints or Feedback

In keeping with National Principle 6, PGSA will:

- Provide avenues for submission of complaints and feedback to ensure that children, young people and their families feel valued and respected. PGSA recognises complaints and feedback improve the quality of its service.
- Receive compliments, complaints or feedback verbally to any PGSA Worker or direct to management either by:
  - Telephone on (08) 8344 2722
  - Email at [info@playgroupsa.com.au](mailto:info@playgroupsa.com.au) or
  - Via the Enquiries/Feedback Form available on the website page [www.playgroupsa.com.au/contact-details.html](http://www.playgroupsa.com.au/contact-details.html)
- Deal with all complaints and feedback received in the following manner:
  - Promptly, sensitively and fairly by listening to the complaint/feedback.
  - Making a record of it if received verbally.
  - Acknowledging receipt and advising the time expected for an outcome.
  - Forwarding the complaint to management as soon as possible (if received by any Worker other than management).
  - Management to respond to the complainant with an outcome in a timely manner.
  - Clearly documenting and securely store decisions and actions taken in response to complaints and feedback.
  - Making sure that procedural fairness is followed at all times.
  - Advising the complainant that if they are not happy with the outcome from the complaints process, they can contact:



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- Health and Community Services Complaints Commissioner  
Online: [Make a Complaint - HCSCC](#) Tel: 8226 8666
  - Australian Human Rights Commission Online: [Complaints | Australian Human Rights Commission](#) Tel: 1300 656 419
  - South Australian Equal Opportunities Commission (for complaints relating to discrimination) Online: [Making a complaint | Equal Opportunity SA](#) Tel: 08 8207 1977.
  - Australian Charities and Not-for-profits Commission (for complaints relating to governance) Online: [What the ACNC can investigate | ACNC](#) Tel: 132262
- Ensure its Workers receive a copy of the Complaints Management Procedure as part of their Induction.

## 4.9 Risk Management

In keeping with National Principle 8, PGSA practices the following in relation to identifying and mitigating risk in relation to children.

Identified risk	Actions to minimise risk
Physical contact	<ul style="list-style-type: none"> <li>• any physical contact must be appropriate to the delivery of services being provided</li> <li>• where physical contact is required, this is undertaken in a safe way by explaining why contact is required and what will happen, and asking the child/young person for their permission (or their family if this is more appropriate) before proceeding</li> <li>• unnecessary physical contact is not allowed</li> </ul>
Online communications	<ul style="list-style-type: none"> <li>• cyber safety and social media guidelines are in place and provided to all Workers</li> <li>• appropriate supervision is provided for all online activities</li> <li>• Workers must not communicate with children or young people via social media</li> </ul>
Supervision	<ul style="list-style-type: none"> <li>• children and young people are to be supervised by parents/guardians at all times</li> </ul>
Taking images of children and young people	<ul style="list-style-type: none"> <li>• consent of child or young person and parent/guardian required</li> <li>• disclosure will be made to child, young person and parent/guardian as to how the image is to be used</li> <li>• images must be presented in a way that de-identifies the child or young person</li> </ul>



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Physical environment	<ul style="list-style-type: none"> <li>• maintain a risk register that is reviewed annually to ensure effectiveness</li> <li>• conduct risk assessments for all activities</li> <li>• ensure all equipment is in good working order</li> </ul>
Privacy and confidentiality	<ul style="list-style-type: none"> <li>• documents containing confidential information will be stored securely with restricted access</li> <li>• digital files containing confidential information will be protected electronically with restricted access</li> <li>• Workers must not disclose information regarding any child or young person without written consent of the child, young person and their parent/guardian unless legally required to</li> </ul>

## 4.10 Policy Review

In keeping with National Principle 9, PGSA will:

- At a minimum, review this policy and the related procedures once every 5 years as required by the Children and Young People (Safety) Act 2017.
- Review this policy when:
  - new or added risks are identified for children or young people, which may require a change in the policy or procedures.
  - a critical incident where a child or young person has experienced harm through involvement in the organisation.
  - concerns are raised by anyone involved in our organisation about child safety or welfare in the organisation.
  - awareness or compliance to the child safe policy and/or procedures is low.
  - legislative changes/requirements occur.
- Lodge a new Child Safe Environments Compliance Statement with Department of Human Services each time this policy is reviewed and updated.

## 5.0 Roles, responsibilities and delegations



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## ROLE

## RESPONSIBILITY

Board

Playgroup SA Board of Management assumes the responsibility of establishing and maintaining child safety and wellbeing policies and procedures.

Board members must hold current National Police Checks and current Working With Children Checks and must complete relevant modules of the Child Safe Organisations National Principles training.

CEO

It is the responsibility of the CEO to ensure that:

- Playgroup SA complies with legislative requirements.
- All staff, contractors, students, volunteers, board members and registered community playgroup coordinators have a valid and current Working with Children Check.
- All staff, contractors, students and volunteers have completed the full day course of Safe Environments Through their Eyes Training upon commencing employment and complete a 3 hour refresher every 3 years.
- Report any adverse findings as a result of Working with Children Checks of staff, volunteers, and students to Board.
- The procedures for reporting harm or risk of harm to children are followed.

It is the responsibility of Playgroup SA, staff, contractors, students and volunteers to ensure that

- They have valid and current National Police Checks and Working with Children Checks.
- The procedures for reporting harm or risk of harm to children are followed.
- Have completed Safe Environments Through their Eyes Training upon commencing employment.
- Their Safe Environments Through their Eyes Training is valid and current upon commencing employment.

Senior Business Partner

To check the validity of WWCC for Workers and registered playgroup coordinators upon induction and confirm no aspects have changed since issuing.

## 6.0 Related Internal Policy and Supporting Documents



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Legislative and Regulatory Documents	Constitution of Playgroup SA Inc
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Frameworks	Risk Management Framework
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Policies	N/A
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Procedures	Child Safe Environments Procedure Complaints Management Procedure
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Work Instructions	N/A
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Supporting Documents	Child Safe Code of Conduct HR Manual
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## 7.0 Related External References and Supporting Documents

This document has been informed by the following legislation and resources:

- [South Australia Associations Incorporations Act 1985](#)
- [Australian Charities and Not-for-profits Commission Act 2012 \(Cth\)](#)
- [Australian Charities and Not-for-profits Commission Governance Standards](#)
- [ACNC External Conduct Standards](#)
- [National Principles for Child Safe Organisations \(Cth\)](#)
- [Child Safety \(Prohibited Persons\) Act 2016](#)
- [Child Safety \(Prohibited Persons\) Regulations 2019](#)
- [Children and Young People \(Safety\) Act 2017](#) (to be repealed)
- [Children and Young People \(Safety and Support\) Act 2025](#) (not yet in force)
- [Children's Protection Law Reform \(Transitional Arrangements and Related Amendments\) Act 2017](#)
- <https://dhs.sa.gov.au/how-we-help/child-and-family-support-system-cfss/child-safe-environments/creating-a-policy>



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- [Mandated notifiers and their role - Department for Child Protection](#)
- [Mandatory Reporting Information Booklet \(PDF 1.6 MB\)](#)
- [National Principles for Child Safe Organisations - Australian Human Rights Commission \(PDF 1 MB\)](#)
- [Final report: Making institutions child safe - Royal Commission into Institutional Responses to Child Sexual Abuse \(Volume 6\)](#)
- [Trust is a Must: What does it take to be child friendly and child safe? - Education Standards Board](#)
- [Keeping Our Kids Safe: Cultural Safety and the National Principles for Child Safe Organisations](#)

## 8.0 Version history

Version	Date	Brief summary of change
1.0	07/02/2020	Initial policy with additional pages outlining the Child Safety and Wellbeing Procedures.
2.0	20/12/2021	Changes to the Purpose, Definitions, and Policy sections.
3.0	01/07/2025	Change of name from Child Safe and Wellbeing Policy to Child Safe Environments Policy, in keeping with Department for Human Services documentation.  Full review of content.