



Child Safety and Wellbeing (Revision 1)

Target audience: All those undertaking paid or unpaid work on behalf of the Great Barrier Reef Marine Park Authority ('the Authority'), whose work involves, results in, or relates to contact with children.

Purpose

1. The purpose of this policy is to:
 - 1.1. demonstrate the Authority's commitment to the safety and wellbeing of children and young people, and the [National Principles for Child Safe Organisations](#)
 - 1.2. inform all personnel of their obligations to act ethically towards children and their roles and responsibilities in ensuring the safety and wellbeing of children
 - 1.3. provide guidance on the processes that aim to ensure children's safety and wellbeing across all areas of the Authority's work¹.

Context

2. The Great Barrier Reef Marine Park Authority (the Authority) recognises that it is the shared responsibility of all adults to prevent child exploitation and abuse. In Australia, there is recognition that organisations that work with children also have a role in protecting them, and need policies and procedures to enable them to do so. The policy is principles based, articulates the Authority's zero tolerance of child exploitation and abuse, and includes expectations of Authority personnel and Authority funded partners in the management of child protection risks. It enables the Authority to meet community expectations and uphold the [United Nations Convention on the Rights of the Child](#) to which Australia is a signatory.
3. In support of the Authority's zero tolerance of child exploitation and abuse, all Authority personnel and Authority funded partners must report immediately any suspected or alleged case of child exploitation, abuse or policy non-compliance by anyone within scope of this policy in connection with official duties or business. All information provided will be treated in accordance with relevant Commonwealth legislation, including the *Privacy Act 1988*.
4. Authority personnel responsible for the management of Authority activities and programs must familiarise themselves with this policy and the principles it contains. All Authority personnel remain bound by the Australian Public Service (APS) Code of Conduct. The behaviours addressed in this policy are consistent with the APS Code of Conduct.

Scope

5. This policy applies to all personnel who conduct work for the Authority in a paid or unpaid capacity. This may include, but is not limited to, board members, executive leadership, staff, volunteers, interns/ work experience students/ trainees, contractors and consultants. This policy also applies to all activities within the Authority which involve, result in or relate to working with children, including contact with children.
6. The policy applies to all Authority funded partners that receive Authority funding including:
 - 6.1. Contractor organisations and their personnel
 - 6.2. Consultants, advisers and contracted individuals
 - 6.3. Downstream partners or organisations who are subcontracted by the Authority funded such as consultants, contractors or advisers and their respective personnel
 - 6.4. Volunteers program participants
 - 6.5. Authority grant recipients.
7. Authority funded partners are expected to act in accordance with the policy principles outlined in this document. They must also abide relevant domestic and international legal obligations and frameworks which seek to protect children.

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Definitions

8. **Abuse** means:
- 8.1. **physical abuse**—the use of physical force against a child that results in harm to the child. Physically abusive behaviour includes shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning
 - 8.2. **neglect**—the failure by a parent or caregiver to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and wellbeing
 - 8.3. **emotional abuse**—refers to a parent or caregiver's inappropriate verbal or symbolic acts toward a child, or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child's self-esteem or social competence
 - 8.4. **sexual abuse**—the use of a child for sexual gratification by an adult or significantly older child or adolescent. Sexually abusive behaviours can include fondling genitals; masturbation; oral sex; vaginal or anal penetration by a penis, finger or any other object; fondling breasts; voyeurism; exhibitionism; and exposing the child to, or involving the child in, pornography
 - 8.5. **ill-treatment**—disciplining or correcting a child in an unreasonable and seriously inappropriate or improper manner; making excessive and/or degrading demands of a child; hostile use of force towards a child; and/or a pattern of hostile or unreasonable and seriously inappropriate degrading comments or behaviour towards a child
 - 8.6. Note: abuse may also include a child or children being present (hearing or seeing) while any member of their household is subjected to any of the above.
9. **Authority funded partner** includes an individual or organisation that receives Authority administered funding, as well as other contract arrangements funded by the Authority, including any partners engaged through the lead partner that the Authority has the legal agreement with (see also personnel and contractor definitions).
10. **Authority staff** means people employed by the Authority on a permanent, contract or temporary basis in Australia or overseas (see also personnel definition).
11. **Behavioural-based interview questions** means interview questions that probe the applicant's past behaviour in specific situations relevant to the position. Behavioural-based questions give interviewers additional information about the applicant's suitability to work with children
12. **Blue Card**; see Police clearance certificate.
13. **Child** or **children** means in accordance with the United Nations Convention on the Rights of the Child, 'child' means every human being under the age of 18 unless under the law applicable to the child, majority is attained earlier. For the purposes of this policy, GBRMPA considers a child to be a person under the age of 18 years.
14. **Child exploitation** means one or more of the following:
- 14.1. committing or coercing another person to commit an act or acts of abuse against a child
 - 14.2. possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material
 - 14.3. committing or coercing another person to commit an act or acts of grooming or online grooming
 - 14.4. using a child for profit, labour, sexual gratification, or some other personal or financial advantage
15. **Child protection** means an activity or initiative designed to protect children from any form of harm, particularly that arising from child exploitation and abuse
16. **Child protection awareness** means the training or minimum understanding personnel require to be aware of child protection policies, procedures when working or having contact with children.

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17. **Child protection policy** means a statement of intent that demonstrates a commitment to safeguard children from harm and makes clear to all what is required in relation to the protection of children. It helps to create a safe and positive environment for children and to show that the organisation is taking its duty and responsibility of care seriously
18. **Child-related position** means any position where personnel work with children or have contact with children as part of their role.
19. **Child Safety and Wellbeing** means the broad obligation on staff and partners to ensure that the design and delivery of the Authority's programs and organisational operations do not expose children to adverse impacts, including the risk of abuse and exploitation, and that any concerns about children's safety within the communities where they work are appropriately reported
20. **Contact with children** means working on an activity that involves or may involve contact with children due to the nature of the work environment or activity, and includes incidental contact with children (also see Incidental contact with children and Working with children definitions)
21. **Contractor** means the individuals engaged to perform specific services under a contract and includes:
 - 21.1. specified personnel nominated in a head agreement with an intermediary company (the contractor) to which payment is made; or
 - 21.2. if the person performing the service is the service provider, they are an individual contractor; or
 - 21.3. if the contractor engages a subcontractor to perform the services, he/she/organisation is the managing contractor.
22. **Criminal record check** means a check of an individual's criminal history record. In Australia, national criminal record checks are available through state and territory police departments (also see Blue Card and Police clearance certificate definitions).
23. **Grooming** generally, refers to behaviour that makes it easier for an offender to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child, and then seek to sexualise that relationship (for example by encouraging romantic feelings, or exposing the child to sexual concepts through pornography)
 - 23.1. **Online grooming** means the act of sending an electronic message to a child, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender; or of sending an electronic message with indecent content to a recipient who the sender believes to be a child.
24. **Harm** means any detrimental effect on a child's physical, psychological or emotional wellbeing. Harm may be caused by financial, physical or emotional abuse, neglect, and/or sexual abuse or exploitation whether intended or unintended
25. **Impact** means the overall long-term effect. This includes positive and negative changes (directly or indirectly, intended or unintended)
26. **Incidental contact with children** means working on an activity where contact with children is not planned or expected but may occur by chance (see also Contact with children and Working with children definitions)
27. **Informed consent** means ensuring the child and the parent or guardian understand the implications, purpose and potential uses of photographs or videos prior to filming or photographing' or 'prior to the activity'
28. **Parent or guardian** means a person that provides the routine day-to-day care and parental responsibility for a minor.
29. **Personnel** means personnel employed by the Authority or by an organisation, appointed to an organisation, on a voluntary or unpaid basis. Personnel can include paid staff, volunteers, interns, trustees, board members.

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30. **Police clearance certificate** means the certificate showing the results of a criminal record check, which is issued by the police or other authority responsible for conducting such checks. For child safety related police checks, each state or territory issues a different certificate card which are currently referred to as:
- 30.1. [Working with Children Blue Card](#) (Queensland)
 - 30.2. [Working with Vulnerable People Card](#) (Australian Capital Territory)
 - 30.3. Other states and territories have relevant equivalent checks and certificate.
 - 30.4. These names may change from time to time.
31. **Policy non-compliance** means the failure to abide by the Authority's policy
32. **Procedural fairness**: is a legal principle whereby person is given the opportunity to defend themselves and raise any mitigating circumstances before a decision is made. In the context of this policy this includes personnel who conduct work for the Authority in a paid or unpaid capacity as outlined in the 'Scope'.
33. **Statutory declaration** mean a written statement which a person signs and declares to be true before an authorised witness
34. **Subcontractor** means an individual engaged to perform a portion of and/or the specific services, working under a contract with a managing contractor as part of Authority funded activities/contract.
35. **Unacceptable risk** means the portion of identified risk that cannot be tolerated, and that must be either eliminated or controlled. For people deemed an unacceptable risk, control mechanisms are not considered appropriate
36. **Unsupervised child** means a child who is not watched or overseen by a parent, guardian or responsible adult.
37. **Working with children** means being engaged in an activity with a child where the contact would reasonably be expected as a normal part of the activity and the contact is not incidental to the activity. Working with children includes volunteering or other unpaid work with children.

Related documents/ legislation

- [Commonwealth Child Safety Framework](#)
- [Child Protection Act 1999](#) (QLD)
- [Working with Children \(Risk Management and Screening\) Act 2000](#) (QLD)
- [Working with Vulnerable People \(background checking\) Act 2011](#) (ACT)
- [General Records Authority 41, Child Sexual Abuse Incidents and Allegations](#)
- Internal Accountable Authority Instructions (document number 100199)
- Internal Risk Management Policy (document number 100427)
- Internal Complaints Management Policy (document number 100454) and Complaints Management Procedure (document number 100462)
- Internal Photographic and Audiovisual Material - Management and Use (internal policy and associated procedures and forms)

Note: Staff engaged in other States or Territories would be required to ensure compliance with the relevant legislation.

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Policy statements

38. The Authority's policy is based on five (5) principles regarding Child Safety and Wellbeing:

Principle 1: Zero tolerance of child exploitation and abuse

- 38.1. The Authority has a zero tolerance approach to child exploitation and abuse. Child exploitation and abuse attract criminal, civil and disciplinary sanctions from relevant authorities.
- 38.2. The Authority will ensure adequate procedures are in place to not knowingly engage—directly or indirectly—anyone who poses a risk to children.
- 38.3. The Authority works to minimise risks of child exploitation and abuse that may be associated with its functions and programs, and will train its staff and partner organisations and individuals who help to deliver programs administered by the Authority on their obligations under this policy.

Principle 2: Assess and manage child protection risk and impact

- 38.4. While it is not possible to entirely eliminate risks of child exploitation and abuse, careful management can identify, mitigate, manage or reduce risks to children that may be associated with Authority's functions and programs.

Principle 3: Sharing responsibility for child protection

- 38.5. To effectively manage risks to children, the Authority requires the commitment, support and cooperation of partner organisations and individuals which help to deliver programs administered by the Authority.
- 38.6. The Authority will provide child protection awareness training to all staff and make this training available for partner organisations and individuals who help to deliver programs administered by the Authority.

Principle 4: Procedural fairness

- 38.7. The Authority will apply the legal principle of procedural fairness when making decisions that affect a person's rights or interests. The Authority's partner organisations and individuals who help to deliver programs administered by the Authority are expected to adhere to this principle when responding to concerns or allegations of child exploitation and abuse.²

Principle 5: Recognition of the best interests of the child

- 38.8. Australia is a signatory to the United Nations Convention on the Rights of the Child. The Authority is committed to upholding the rights of the child and Australia's obligations under this convention. The Authority expects its international partners to have complementary child protection arrangements in place.

Risk based approach

- 39. The policy provides a risk-based approach to the management of child protection in the Authority's business activities as per the Authority's [Risk Management Policy](#).
- 40. In taking this approach, the first question to ask is 'does the program, activity or grant involve [children](#)'? If the answer is yes, an assessment of child protection risk must be conducted as part of a standard risk assessment process. Relevant risk and decision-making processes and documents must reflect this assessment. An assessment of child protection risk should be incorporated into existing activity planning and risk management processes.
 - 40.1. If the program, activity or grant is determined to be 'working with children', an assessment of child protection risk is required and the application of all minimum child protection standards (at [Appendix A](#)) is required. The Authority requires its funded partners to build on these minimum standards as appropriate to their activity or organisation.
 - 40.2. If the program, activity or grant is determined to be '[contact with children](#)'* or impacts children then an assessment of child protection risk is required and, depending on the level

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of risk identified, application of appropriate minimum child protection standards to manage the risk.

- 40.3. Where it is determined there is no 'impact on or contact with children', the minimum compliance standards at [Appendix A](#) will not apply. It is anticipated that a number of domestic whole-of-government panel and corporate contracts will fit this scenario.
41. The Authority has these minimum child protection standards to ensure that all funded partners (as defined under this policy) understand and act on their obligations to manage risks to children.
42. Guidance on establishing the risk context is available to assist Authority staff and Authority funded partners. Regular monitoring for any change in risk and reporting on the effectiveness of the management of child protection risk must also occur.

Specific Requirements for Authority Programs

43. The Authority has identified that contact and working with children is likely in the following programs:
- 43.1. Reef Guardian Program (particularly Reef Guardian Schools but may also include other Reef Guardian activities and grants).
- 43.2. Reef HQ Aquarium including the Reef HQ Volunteer Association
- 43.3. Traditional Owners, community and public engagement

Specific requirements for Authority funded partners

44. All Authority funded partners are expected to act in accordance with the policy principles outlined in this document.
45. For all agreements with funded partners, Authority staff must ensure child protection risks are considered and managed in accordance with the Authority's risk management practices. Once identified the Authority will identify child protection obligations of funded partners in Procurement request documentation, contracts and agreements for activities that have child protection impacts. The child protection approach must apply to all personnel, volunteers, partner organisations and subcontractors who are engaged under these programs.
46. Where 'working with children' is identified, Authority funded partners must undertake an assessment of child protection risk and apply – and build on (where appropriate) – all nine minimum standards at [Appendix A](#) and [Appendix B](#).
47. Where 'contact with children' is identified in delivery of Authority business, the Authority requires Authority funded partners to:
- 47.1. undertake their own risk assessment of each Authority funded activity to ensure they identify and manage risks to children appropriately. This can be incorporated into existing activity planning and risk management practices. Child protection safeguards should be in keeping with the minimum child protection standards at [Appendix A](#) and [Appendix B](#) including appropriate recruitment, screening, and employment practices
- 47.2. ensure personnel are trained in child protection awareness and understand their obligation to protect children when carrying out their work
- 47.3. have clear internal reporting mechanism or procedure for their personnel to report concerns, and
- 47.4. immediately report any suspected or alleged instances of child abuse, exploitation, harm or child protection policy non-compliance to the Authority.
48. Any suspicion or disclosure of child abuse and exploitation must be reported immediately through the Authority funded partners internal processes and to the Authority. When responding to allegations, the Authority has a responsibility to ensure personnel are treated fairly, and that the rights of each individual are respected during an investigation and any applicable disciplinary process.
49. For Authority funded activities that have no contact or impact on children, Authority minimum standards do not apply. However, Authority funded partners that are child related organisations

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are required to meet the minimum standards irrespective of whether the Authority funded activity involves working or contact with children.

Specific requirements for Subcontractors

50. The requirement to develop and implement a child-safe approach also applies to all downstream personnel, partners and subcontractors who are engaged by an Authority funded partner to perform any part of an Authority funded activity where 'working with' or 'contact with children' is identified. The managing contractor must ensure the downstream organisation or individual subcontractor complies with the relevant minimum child protection standards.

Accountabilities and responsibilities

51. Personnel will comply with their accountabilities and/or responsibilities as outlined within **Table 1** below, noting that some people may have more than one set of obligations.

Table 1: Accountabilities and responsibilities of various worker types under this policy

Who	Accountability/ responsibility
Child Safety Framework Champion General Manager, Reef Strategy	Responsible for overseeing implementation, chairing the Child Safety Framework Working Group and reporting progress twice yearly to the Accountable Authority.
Child Safety Framework Working Group	Responsible for liaising with personnel to annually undertake a risk assessment of the Authority's activities to: A. identify the level of contact with children and young people B. evaluate the risk of harm or abuse, and C. establish appropriate strategies for managing identified risks to so far as is reasonably practicable ³ . Responsible for establishing and maintaining a system of compliance with the Commonwealth Child Safe Framework – including by: A. establishing an Authority-wide child safety policy B. regularly communicating to Personnel child safety issues and trauma-informed approaches to responding to complaints from children C. ensuring children are aware of their rights D. meeting mandatory reporting requirements ³ .
All those undertaking paid or unpaid work on behalf of the Authority (or via funding provided by the Authority) whose work involves, results in, or relates to contact with children (including contractors/ suppliers/ consultants, grant recipients, volunteers, work experience students or similar).	Responsible for complying with the requirements of this policy, and for including child safety considerations in all aspects of day to day business, regardless of working in a child-related position. Responsible for, so far as is reasonably practicable, ensuring contact or work with children occurs in visible work environments (e.g., glass-paneled offices/ meeting rooms/ open plan offices or spaces) ³ . Responsible for ensuring, to the greatest extent possible, that children are accompanied by a parent or guardian ³ . Where applicable, responsible for including products/ materials developed for children in open areas rather than closed or hidden areas ³ . Personnel who are required by law or by the Commonwealth Child Safety Framework to hold a Police Clearance Certificate must do so and must ensure it is visible at all times when undertaking Authority business.
All those supervising others (including contractors/ suppliers, volunteers, grants recipients or people/entities who otherwise receive Authority funds).	Responsible for including products/ materials developed for children in open areas rather than closed or hidden areas ³ . Responsible for ensuring, to the greatest extent possible, that personnel are supervised, where appropriate, in situations where they have contact or are working with children ³ .

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Who	Accountability/ responsibility
	Responsible for imposing, through written agreement, child safety requirements consistent with the Commonwealth Child Safe Framework, on any individual or organisation funded by the Authority ³ .
Communications and Regional Engagement section	Responsible for embedding relevant child safety information into social media and communication policies of the Authority ³ . Responsible for integrating into the Authority's complaints management policy/ protocol the reporting and escalation procedures to be followed in relation to child safety ³ , and for assuring complaints management processes are consistent with the 'Complaint Handling Guide: Upholding the rights of children and young people' ⁴ . Responsible for ensuring the Authority's Child Safety complaints management policy/ protocol is available and accessible for children and young people ³ .
Human Resources section staff	Responsible for establishing child safe recruitment and screening practices which is able to be applied to all Personnel, and includes child safety induction training, behavior-based interview questions to be used, reference checks, police checks and Working with Children Checks ³ . Responsible for maintaining records of currency of Working with Children Checks ³ . Responsible for making available appropriate training on child safety, including child safety induction training ³ . Responsible for managing reporting processes.
Information Management Systems and Technology section staff	Responsible for having online safety protocols and procedures Responsible for monitoring monitor inappropriate use of equipment or online interactions with children and being able to respond to a breach of ICT policies and apply any appropriate sanctions.
Governance Support Unit staff; and Finance section staff	Responsible for the maintaining the Authority's: risk management policy and framework tools, and providing advice on their use; 'controlled document' management system policy and tools (including monitoring the currency of documents housed on the master document list); and procurement forms and templates, and providing advice on their use.
Legal Services Section	Responsible for ensuring contracts the Authority enters into include appropriate child protection clauses.
All Directors (Executive Level 2 staff) and all General Managers (SES staff)	Responsible for managing and remedying non-compliance with this policy. Accountable (to the Chief Executive Officer) for fostering an observably high level of commitment to a culture supporting child safety and wellbeing.
The Chief Executive Officer as the Accountable Authority	Accountable for ensuring the Authority implements at least the minimum requirements of the Commonwealth Child Safety Framework: A. annual risk assessment and risk mitigation; B. clear internal child safe policies that inform staff of their obligations in relation to the safety and wellbeing of children; C. identification of the roles that require working with children checks (or working with vulnerable people checks) and a compliance regime to manage and keep them current; D. child safe recruitment, screening and induction processes; E. ongoing staff training (training should be trauma informed); F. child-focused procedures for responding to concerns and complaints about child safety; and G. upholding children's rights through policies, procedures and practices that are child focused, trauma informed, and culturally appropriate.
The Marine Park Authority Board	Responsible for being aware of the requirements of the Commonwealth Child Safety Framework as employees of the Authority.

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Compliance mechanisms

52. The Authority monitors compliance with policy requirements through performance assessments, reviews and a program of audits and spot checks. Where minimum child protection standards are required, the Authority requires documentary evidence to demonstrate that Authority funded partners are meeting these standards. Non-compliance with the minimum child protection standards where required may lead to suspension or termination of funding arrangements.
53. Under Authority contracts, the Authority can ask to remove individuals from working on an activity when an individual has been accused, charged, arrested or convicted of a criminal offence relating to child exploitation and abuse, or when the Authority considers that an individual poses a risk to a child's safety or well-being. The Authority also requires anyone under formal investigation for offences relating to child exploitation and abuse to be suspended from duty or transferred to other duties during an investigation. Before any decisions are taken, these matters must be referred to Legal Services and the Human Resources[?] team for advice.
54. The Authority reserves the right to terminate contract negotiations, refuse to engage an individual, or require an individual to be replaced if appropriate criminal record checks are not undertaken, or cannot be undertaken for roles that require working with or having contact with children. Before any decisions are taken, these matters must be referred to Legal Services and the Human Resources team for advice.

Reporting obligations and complaints

55. It is mandatory for all Authority personnel to report immediately any suspected or alleged case of child exploitation, abuse or policy non-compliance by anyone within scope of the policy in connection with official duties or business. Members of the community can also report such instances to the Authority.
56. Personnel must report any behaviour that is suspected of being child exploitation or abuse (including possession of child exploitation material) or policy non-compliance by anyone.
57. Personnel must also report any report or complaint made to them by anyone relating to child exploitation and abuse or policy non-compliance.
58. Where an individual or organisation has already reported, but becomes aware of additional information, the individual or organisation must also report that information.
59. **Where harm is occurring or there is imminent risk to the safety and wellbeing of any person, personnel must immediately contact emergency services by dialling triple-zero.**
60. Information reported to the Authority will only be accessible to appropriately authorised Authority staff. All information received will be protected in accordance with the *Privacy Act 1988* to protect the privacy of individuals and handling personal information.

References

- 1 Australian Human Rights Commission, 2019, *Child Safe Organisations: Child safety and wellbeing policy template*, Commonwealth of Australia, Sydney, NSW.
- 2 Australian Government Attorney-General's Department, 2012, *Procedural fairness guidelines*, Commonwealth of Australia, Canberra, ACT.
- 3 Department of the Prime Minister and Cabinet, 2019, *Commonwealth Child Safe Framework*, Commonwealth of Australia, Canberra, ACT.
- 4 Department of the Prime Minister and Cabinet, 2019, *Complaints Handling Guide: Upholding the rights of children and young people*, Commonwealth of Australia, Canberra, ACT.

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Appendix A: Minimum child protection standards

There are three minimum child protection standards expanded in the table below with details on the minimum standard, evidence, explanation and risk:

1. Having a Child Protection Policy and reporting procedure in place
2. Undertaking assessment and management of risk
3. Recruitment and screening, and employment practices in place

#	Minimum standard	Minimum standard – evidence	Why is this required?	What is the risk without it?
Requirement 1: Having a Child Protection Policy and reporting procedure in place				
A.	<p>Partners/Organisations The organisation has a child protection policy that applies to all personnel, partner’s downstream personnel and subcontractors that are engaged by the organisation to perform any part of an Authority funded activity.</p> <p>The managing partner must ensure the downstream organisation or individual subcontractor complies with the relevant minimum child protection standards.</p> <p>Individuals An individual contractor is not required to have a child protection policy. However, they will be required to sign a code of conduct that applies and builds on where appropriate GBRMPA’s Child Protection Professional Behaviours and provide evidence of their commitment to child protection.</p>	<p>Partners/Organisations</p> <ul style="list-style-type: none"> <input type="checkbox"/> Child protection policy in place <input type="checkbox"/> Personnel aware of the organisation’s child protection policy (e.g. through internal communication and training) <input type="checkbox"/> Documented plan for ensuring downstream Authority funded partners are meeting the minimum standards <input type="checkbox"/> Initial risk assessment of organisation and activities to inform policy development. <p>Individuals</p> <ul style="list-style-type: none"> <input type="checkbox"/> Complete child protection training <input type="checkbox"/> Sign code of conduct <input type="checkbox"/> Commitment to child protection <input type="checkbox"/> Current Criminal Record Check 	A child protection policy provides clear guidance and demonstrates how the organisation, across its operations, will work to protect children from child exploitation and abuse in the delivery of Authority funded programs.	An organisation is unaware of the risks to children within their organisation and the activities they manage and/or implement. Having a sub-contractor sign up to a code of conduct as the only control does not provide sufficient contractual effect to address child protection issues.
B.	The organisation’s child protection policy includes a documented reporting procedure for child exploitation and abuse allegations, code of conduct and policy non-compliance, including available sanctions for breaches.	<ul style="list-style-type: none"> <input type="checkbox"/> Organisation’s guidelines for managing concerns or allegations of child exploitation and abuse, and policy non-compliance <input type="checkbox"/> Documentary evidence that personnel can raise concerns about a child’s safety or well-being or unacceptable behaviour by personnel <input type="checkbox"/> Documentary evidence outlining the organisation’s details of available sanctions 	An effective child protection policy requires a report handling procedure. Reporting systems must respect the rights of both the alleged victim and the alleged offender.	<p>One of the biggest hurdles to personnel reporting child exploitation and abuse is that there is no formal system in place to do so, or that personnel or community members are not aware of a formal system to report concerns or allegations.</p> <p>Personnel are unaware how to report concerning behaviour.</p>

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Child Safety and Wellbeing (Revision 1)

#	Minimum standard	Minimum standard – evidence	Why is this required?	What is the risk without it?
		<input type="checkbox"/> Documentary evidence that policy and reporting information is publically available and accessible to community members		Community members are unaware how to report concerning behaviour.
C.	The organisation provides child protection training for personnel, including downstream partners.	<input type="checkbox"/> Training attendance records, agendas and timeframes for training <input type="checkbox"/> Materials used in training	Personnel must be fully aware of their responsibilities to protect children and how to report concerns or allegations about child exploitation and abuse.	Personnel are unaware of behaviour that would arouse concern. Personnel are unaware of how to build child protection practices into their work and/or do not know how to report concerning behaviour.
D.	The organisation’s child protection policy includes a commitment to preventing a person from working with children if they pose an unacceptable risk to children.	<input type="checkbox"/> Referenced in relevant documentation, including policies, contracts and human resource guidelines	The organisation, as an employer, must have clear grounds to determine whether a person is the most appropriate to work with children.	A lack of leadership and governance and the right culture undermine personnel efforts to implement a child protection environment.
E.	The organisation’s child protection policy is subject to regular review, at least every five years or earlier if needed.	<input type="checkbox"/> Policy is subject to regular review in accordance to the policy commitment, or at least every five years	Contexts change, particularly in the development sector. There must be a commitment to review and update the policy as required.	Lessons learned from previous incidents are not taken into account, increasing the likelihood that those risks will be repeated.
Requirement 2: Undertaking assessment and management of risk				
A.	The organisation undertakes a risk assessment to reduce the risk of any child being harmed as a result of operations or activities funded by the Authority. The assessment must identify risks, and document steps being taken to reduce or remove these risks.	<input type="checkbox"/> Risk plan identifying activities and measures to reduce or remove the risk to children <input type="checkbox"/> Documentation that risk assessments are reviewed and updated regularly during the life of the activity <input type="checkbox"/> Evidence of adaption to local context (when a different approach to standard risk controls is required)	Some activities are higher risk than others. This may be due to the nature of the activity or the location. For example, working with children with disability or in an emergency situation involve higher risks.	Risks to children are missed during activity design and implementation.
Requirement 3: Recruitment and screening, and employment practices in place				
A.	The organisation’s employment contracts contain provisions for suspension or transfer to other duties of any employee who is under investigation and provisions to dismiss any employee after an investigation	<input type="checkbox"/> Employment contracts for personnel/consultants contain appropriate provisions	Robust recruitment, screening and employment practices reinforce the importance of the organisation’s child protection policy to personnel.	Personnel that pose unacceptable risks to children are unable to be removed (suspended, transferred or terminated) without a criminal conviction.
B.	Contact with children positions The organisation has robust recruitment screening processes for all personnel in	<input type="checkbox"/> Documented criminal record checks for personnel in contact with children <input type="checkbox"/> Documented verbal referee checks	Child-safe recruitment and screening processes are essential to enable an	Your organisation may be targeted by adults who wish to harm children (due to weak recruitment and screening practices)

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POLICY
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Child Safety and Wellbeing (Revision 1)

#	Minimum standard	Minimum standard – evidence	Why is this required?	What is the risk without it?
	<p>contact with children. These recruitment procedures include:</p> <ul style="list-style-type: none"> - criminal record checks before engagement - verbal referee checks <p>Working with children positions Additional screening measures (such as interview plans that incorporate behavioural-based interview questions) must be used when candidates are applying for positions that involve working with children.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Documented request for an applicant to disclose whether they have been charged with child exploitation offences, and their response <input type="checkbox"/> Interview plans incorporating behavioural-based interview questions that are specific to positions that involve working with children <input type="checkbox"/> Review checks when personnel have a change in circumstances <input type="checkbox"/> In limited circumstances it may prove impossible to obtain a reliable criminal record check. A statutory declaration, or local legal equivalent, outlining efforts made to obtain a foreign police check, and disclosing any charges and spent convictions related to child exploitation, may be accepted instead <input type="checkbox"/> Checks must be conducted for each country in which the individual has lived for 12 months or longer over the last 5 years, and for the individual's countries of citizenship 	<p>organisation to choose the most appropriate person for a position that involves contact with children.</p> <p>Recruitment and selection can prevent access to children by those with a known history of harming children.</p> <p>Child safe recruitment and selection processes can discourage individuals who pose an unacceptable risk to children from applying for positions.</p>	<p>A person who poses an unacceptable risk of harm to children (as indicated by their background) is unknowingly appointed to a position within the organisation.</p>
C.	<p>The organisation has a child protection code of conduct that meets and – builds on (where appropriate) – the minimum standard set by the Authority (see Appendix B – the Authority's Child Protection –Professional Behaviours).</p>	<ul style="list-style-type: none"> <input type="checkbox"/> A risk based child protection code of conduct based on GBRMPA's Child Protection – Professional Behaviours <input type="checkbox"/> Signed codes of conduct or a register documenting details of personnel who have signed the code of conduct, or inclusion in employment contracts <input type="checkbox"/> Signed image consent forms/ verbal consent file notes 	<p>A code of conduct makes clear the organisation's standards for acceptable and unacceptable behaviour in relation to children and must be signed by all personnel.</p> <p>It protects personnel by providing guidance on how to avoid situations that may be perceived as harmful to children. It also provides employers with a sound basis on which to conduct disciplinary action.</p>	<p>Lack of clear, well-advertised rules allows concerning behaviour to go unchallenged.</p>

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Appendix B: Child protection – professional behaviours

Authority funded partners undertaking business on behalf of the Authority that involves working or contact with children are expected to adhere to the following behaviours while they are performing those duties:

1. Treat all children with respect.
2. Do not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
3. Do not engage children under the age of 18¹ in any form of sexual intercourse² or sexual activity,³ including paying for sexual services.
4. Wherever possible, ensure that another adult is present when working near children.
5. Do not invite unaccompanied children into private residences, unless they are at immediate risk of injury or in physical danger.
6. Do not sleep close to unsupervised children unless absolutely necessary, in which case the supervisor's permission must be obtained, and ensuring that another adult is present if possible (noting that this does not apply to an individual's own children).
7. Never use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material through any medium.
8. Do not use physical punishment on children.
9. Do not hire children for domestic or other labour: which is inappropriate given their age or developmental stage; which interferes with their time available for education and recreational activities; or which places them at significant risk of injury.
10. Comply with all relevant Australian and local legislation, including labour laws in relation to child labour.
11. Immediately report concerns or allegations of child exploitation and abuse and policy non-compliance in accordance with appropriate procedures.
12. Immediately disclose all charges, convictions and other outcomes of an offence that relates to child exploitation and abuse, including those under traditional law, which occurred before or occurs during association with the Authority.
13. Be aware of behaviour and avoid actions or behaviours that could be perceived by others as child exploitation and abuse.
14. So far as is reasonably practicable, contact or work with children occurs in visible work environments (e.g., glass-paneled offices/ meeting rooms/ open plan offices or spaces)³.

When photographing or filming a child or using children's images for work-related purposes:

15. refer to the Authority's Photographic and Audiovisual Material - Management and Use Policy and associated procedures and consent forms (available, internally, on the [master document list](#))
16. take care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child
17. obtain informed written consent from the child and parent or guardian of the child before photographing or filming a child. An explanation of how the photograph or film will be used must be provided
18. ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive
19. ensure images are honest representations of the context and the facts
20. ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form

These behaviours are not intended to interfere with normal family interactions.

Authority funded partners must use Appendix B (Child protection – professional behaviours) of the Child Safety and Wellbeing policy as a Child Protection Code of Conduct, or embed those behaviours into their existing policies and processes.

¹ Where the child is 16 years or older and the other party is not more than 2 years older; and it can be established that the child consented to the relationship, an exception can be recorded promptly on personnel files.

² As defined under the *Criminal Code Act 1995*.

³ As defined under the *Criminal Code Act 1995*.

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