Policy 9.11

CHILD PROTECTION

Policy Number:	9.11	Version Number:	3	Date Policy Issued:	27/08/2025
Policy Approval Date:	16/03/2017			Frequency of Review:	3 Years
Policy Approved By:	Chairperson	Reviewing Responsibility:	CEO	Date of Review:	August 2028

POLICY

See Tool: Charter of Commitment to Children and Young People

Report child abuse

In the Northern Territory (NT), you must report your concerns if you believe a child is being, or has been, harmed or abused.

This is a legal responsibility under the *Care and Protection of Children Act 2007* and is called mandatory reporting.

Your report should include any relevant information about your concerns for the child's safety and wellbeing.

You don't need proof of harm or abuse to report your concerns - you just need a reasonable belief that a child has been harmed or is likely to be harmed.

If you make a report in good faith, you are safeguarded under the law from legal or professional liability.

How to report

To make a report on suspected child abuse, you can:

- call the child protection reporting line on 1800 700 250 - 24 hours a day, 7 days a week
- do it online via CARE Services.

If you are not sure if it's something you should report, you should discuss your concerns via the child protection reporting line.

If you believe a child is in immediate danger or a life-threatening situation, call 000 and ask for police.

PROCEDURES

The **Board** of Sandstone has ultimate responsibility for the internal control protocols for the prevention of child abuse and is responsible for ensuring that appropriate and effective policies and procedures are in place.

The **CEO** of Sandstone is responsible for:

- Dealing with and investigating reports of child abuse.
- Ensuring that all staff are aware of relevant laws, organisational policies and procedures, including Staff Code of Ethics and Conduct and Child Safe Code of Conduct.
- Ensuring that all adults within the Sandstone community are aware of their obligation to report suspected sexual abuse of a child in accordance with policies and procedures.
- Ensuring that all staff are aware of their obligation to observe the Child Safe Code of Conduct.
- Providing support for staff in undertaking their child protection responsibilities.

All **Senior Staff** must ensure they:

- Promote child safety always.
- Assess the risk of child abuse within their area of control to eradicate / minimise any possible risk.
- Educate employees about the prevention and detection of child abuse.
- Facilitate the reporting of any inappropriate behaviour or suspected abusive activities relating to the care and protection of children.

All staff share in the responsibility for the prevention and detection of child abuse, and must:

- Familiarise themselves with the relevant laws and Sandstone's policy and procedures in relation to child protection and comply with all requirements.
- Report any reasonable belief that a child's safety is at risk to the relevant authorities to fulfil obligations as mandatory reporters.
- Provide an environment that is safe and protective of all children.

Definition

Child means a person below the age of 16 years unless, under the law applicable to the child, majority is attained earlier.

Child protection: Any measure taken to safeguard children from abuse or harm.

Child abuse: All forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

Concern: A matter that engages a person's attention, interest, or care, or that affects a person's welfare or happiness

Grooming: Any act with the aim of befriending, building rapport, and gaining the trust of a child for the purpose of subjecting them to abuse. Signs of grooming include giving gifts or special attention, or inappropriate touching such as tickling or wrestling with a child.

Online grooming: Establishing a relationship with a child or young person online with the aim of meeting him/her in person for sexual activity. This can include online chat or sexting, and the abuser may lie about their age or identity.

Harm: Different states or territories may have differing definitions of harm in relation to child protection legislation, but in general it refers to any significant detrimental effect on a child's physical, psychological or emotional wellbeing.

Reasonable grounds for belief: "A belief based on reasonable grounds (see below) that child abuse has occurred when all known considerations or facts relevant to the formation of a belief are considered and these are objectively assessed. Circumstances or considerations may include the source of the allegation and how it was communicated, the nature of and details of the allegation, and whether there are any other related matters known regarding the alleged perpetrator.

A reasonable belief is formed if a reasonable person believes that:

(a) the child needs protection,
(b) the child has suffered or is likely to suffer "significant harm as a result of physical injury," or
(c) the parents are unable or unwilling to protect the child.

A 'reasonable belief' or a 'belief on reasonable grounds' is not the same as having proof but is more than mere rumour or speculation.

A 'reasonable belief' is formed if a reasonable person in the same position would have formed the belief on the same grounds.

Sexual abuse: Occurs when an adult or another child or young person uses power and authority to involve a child in sexual activity, and can be physical, verbal or emotional.

Privacy and Confidentiality
Sandstone expects all responsible parties to respect privacy and maintain confidentiality in the handling, storage and communication of personal and confidential information in compliance with organisational standards and policies.

PROCEDURES

Roles and Responsibilities of the Board and Staff:
All members of the Board and staff must sign and act in accordance with the Sandstone Codes of Ethics and Conduct as part of their induction into the organisation and commit to always keeping children safe within the organisation and acting in their best interests.

Board:
The governing body has ultimate responsibility to foster an organisational culture which promotes child safety and protects the wellbeing of children. The governing body will establish policies and procedures which reflect the requirements of the National Principles for Child Safe

Organisations and relevant state child safe standards. Policies and procedures must be appropriate for the size and type of services provided, and effective in enabling all workers to understand their obligation to act to safeguard children and prevent and respond to child abuse. The governing body must be aware of their legal liability for failure to disclose abuse or failure to reasonably protect based on known risks.

Management:
Management should be aware of all mandatory and voluntary reporting obligations which apply in Northern Territory in which Sandstone operates and ensure that all workers are made aware of the obligations that apply to them. Management is also responsible for being aware of and managing any risks to children, and to facilitate internal and/or external reporting by workers.

Child Safe Officer:
The CEO is the primary contact person in the event of any incident or allegation coming to light. The CEO is the contact person for external bodies and will investigate any incidents or allegations of harm.

Staff:
All staff have a responsibility to act in accordance with the Staff Code of Ethics and Conduct and be aware of and comply with their obligations relating to mandatory reporting concerns, allegations and incidents of child abuse, including internal and external reporting.

Employment of new staff

See policy 5.2 Staff Recruitment, Selection and Appointment

Sandstone undertakes a comprehensive recruitment and screening process for all workers which aims to:

- Promote and protect the safety of all children under the care of the organisation.
- Identify the safest and most suitable people who share Sandstone's values and commitment to protect children.
- Prevent a person from working at Sandstone if they pose a risk to children.

Sandstone requires all workers to pass through the organisation's recruitment and screening processes prior to commencing their engagement with Sandstone.

Sandstone requires all staff to provide a police check before they commence working at Sandstone.

Sandstone requires all staff to have an Ochre Card in accordance with the law before they commence working at Sandstone.

Sandstone will undertake thorough reference checks as per the approved internal procedure.

Once engaged, all staff must review and acknowledge their understanding of this Policy.

Advertising and Worker Screening
When advertising a position Sandstone's Statement of Commitment to child safety will be included in the advertisement.

"Sandstone is committed to ensuring children and young people feel safe, empowered and are taken seriously if they raise concerns regarding their safety and wellbeing."

Advertisements for roles that involve contact with children or other child-related work will ensure the position description includes the duty of care and mandatory reporting obligations of prospective workers, Sandstone's zero tolerance policy to child abuse, and the requirement to undergo police, reference and Working with Children Checks during the recruitment process.

Worker Training and Development
Sandstone will foster a culture where all workers are committed to child safety. All workers will undertake training on the rights of children, and the prevention, identification and response to abuse and harm against children.

The Sandstone Employment Hero Induction will include all relevant policies relating to child protection.

Continuous development and training, and refresher training will be held annually or when required including:

- The importance of child safety in minimising risks of child abuse and harm in all organisational contexts
- Organisational policies and procedures relating to child safe environments both online and offline
- How to respect and protect the rights of diverse children, including children with disability, children who are lesbian, gay, bisexual, transgender, and intersex
- Promoting the cultural safety of Aboriginal and Torres Strait Islander children and children from Culturally and Linguistically Diverse (CALD) backgrounds
- How to identify and respond to indicators of child abuse
- Their mandatory and voluntary reporting and duty of care obligations
- How to report concerns that an incident of abuse has occurred.

Ongoing supervision
All workers will receive regular supervision to ensure that they are appropriately carrying out their role and complying with all obligations and expectation regarding adherence to child safe practices, policies and procedures.

See policy 5.24 Counselling Supervision
See Tool Clinical Supervision Record

Respect for Diversity

Sandstone is committed to creating an organisational environment which is accepting and supportive of all children and young people. The organisation will seek to protect the rights of all children and ensure that services are delivered in a safe and inclusive manner.

The organisation respects the diverse needs of children and young people and seeks to provide services which are accessible to all children, and responsive to the safety needs of children with disability, children who are lesbian, gay, bisexual, transgender and intersex, children from economic or socially disadvantaged backgrounds, and the cultural safety of children from CALD backgrounds, and Aboriginal and Torres Strait Islander children.

Sandstone does not tolerate discrimination. It is the responsibility of the Board, CEO and staff to adopt proactive approaches to reduce the risk of discrimination, and to adhere to the organisation's policies and procedures for the protection of the human rights of children and young people. See policy 9.7 Human Rights

Sandstone will respond to instances of racism or any other form of harmful discrimination by invoking policy 5.21 Discrimination, Harassment and Bullying

Cultural Safety for Aboriginal and Torres Strait Islander children

Staff must encourage and support children to express their culture and enjoy their cultural rights. Staff must actively support and facilitate participation and inclusion within the organisation by Aboriginal and Torres Strait Islander children and their families.

Sandstone supports, guides and trains staff to understand, respect and value Aboriginal and Torres Strait Islander children, and their right to a culturally safe service environment which values their safety and wellbeing. Sandstone actively supports and facilitates participation and inclusion of Aboriginal and Torres Strait Islander children and their families.

Sandstone recognises and celebrates Aboriginal and Torres Strait Islander peoples, their achievements, communities and cultures by:

- Acknowledgement of country
- Celebrating NAIDOC week
- Seeking feedback from Aboriginal and Torres Strait Islander children, families and communities on their Sandstone experience.

Involving Families and Communities

Sandstone recognises the important roles that families play and involves parents and carers when significant decisions are made about their child. The organisation will encourage feedback from families and will incorporate feedback into the design and review of services.

The organisation will proactively communicate with families and communities and inform them of its policies and practices to protect child safety. Sandstone will provide information to families

and communities through accessible means to ensure that they are involved in decisions about their child.

We distribute this information by:

- Making our child safe policy publicly available on our website
- Brochures available at Reception
- Brochures given to parents, carers and guardians at child intake to service.

Sandstone involves families and communities by:

- Creating an inclusive environment for all families
- Ensuring information is easy to understand and accessible
- Seeking input on decisions affecting children and young people
- Ensuring transparent complaints handling and discipline processes.

Safeguarding Online Environments

Sandstone is committed to safeguarding children from risks posed by online environments.

The use of communications technology by staff on behalf of Sandstone will be conducted in accordance with this policy, policy 1.10 Staff Code of Ethics and Conduct, and Handbook 11 Information Technology, Communication and Data & Knowledge Management

Assessing and Managing Child Abuse Risk

Child safety risks are included in the organisation's risk management policy and processes. This includes risks in physical and online environments relevant to the service type/s provided by the organisation, people in contact with children, and any specific vulnerabilities of the children.

All counsellors will be trained in identifying, assessing and managing these risks, and detecting signs of abuse. Training should also include protective factors that reduce the risk of abuse, and ways to promote these protective factors in the context of the organisation.

Where a risk is identified and not appropriately managed, management and the Board may be held legally liable, as this may constitute a *failure to protect*.

Sandstone will consider child safety as a part of its risk management approach. Risks of abuse to children will be identified and managed in all services and activities. Sandstone will manage risks to children by:

- Including child safety risk assessment as a regular consideration of the risk management process
- Monitoring and recording all legal requirements for the protection of children by workers and other stakeholders for all jurisdictions of operation
- Establishing policies, procedures and action plans that seek to minimise the likelihood of incidents of child abuse and monitoring their effectiveness
- Implementing, maintaining and reviewing the effectiveness of incident reporting and complaints management systems

- Training workers and stakeholders to understand their obligations towards child safety and encouraging the reporting of incidents
- Engaging all stakeholders to take measures to reduce risks and prevent instances of child abuse.

See policy 10.6 Risk Management (Child Safe)

Reporting, Investigating and Responding to Child Abuse Concerns

Sandstone takes seriously all concerns, complaints and allegations of abuse or suspected abuse against any child or young person in the service. All concerns, complaints and allegations of abuse will be reported to Mandatory Reporting as per Care and Protection of Children Act 2007 (NT)- Mandatory Reporting 1800 700 250

When a Sandstone staff member makes a report, the CEO and or Senior Counsellor must be notified.

Reporting suspected abuse of children by Sandstone staff member

In situations where the supervisor is suspected of involvement in the activity, or if the person having the suspicion does not believe that the matter is being appropriately addressed or dealt with, the matter should be reported to the next highest level of supervision.

Supervisors must report complaints of suspected abusive behaviour or misconduct to the CEO.

The CEO must make an immediate report to police.

If CEO is suspected of child abuse, notify the Board Chairperson who will inform the police.

Conducting investigations

All concerns, complaints and allegations of abuse will be investigated according to Sandstone's policy 5.10 Accidents and Incidents

Where the police or other external authorities have been contacted about a concern, allegation or incidence of child abuse, all investigation will be conducted by them.

The Board may have occasion to conduct an internal investigation. Internal investigations will be conducted in accordance with the principles of natural justice and will remain confidential (however there may be a need to interview or consult other staff members during the investigation).

The Board and workers must fully cooperate with any internal or external investigation that takes place.

Sandstone will seek to determine what organisational processes allowed the incident to happen and undertake all possible measures to mitigate the risk of a similar incident occurring again. Sandstone will follow approved records management and incident recording procedures.

Disciplinary Action

While an investigation is in progress, the worker against whom an allegation is made may be stood down until a decision is made about whether an offence has been committed.

If the investigation concludes that an offence has been committed, or is likely to have been committed, disciplinary action will be taken proportionate to the severity of the offence including legal action.
See policy 5.16 Under-Performance and Misconduct

Where a person is terminated from the organisation due to being found to have committed an offence, the CEO has responsibility for notifying the relevant bodies for child protection and safety.

Internal communication about suspected or actual child abuse
Internal stakeholders will be informed when there has been a reportable incident/suspected/actual child abuse and what measures have been put in place to respond quickly and appropriately.

Supporting Affected Persons
Sandstone is responsive to the needs of all persons affected by a disclosure of child abuse. Sandstone will ensure workers are trained and aware of the processes for providing support to affected persons, including trauma-informed practice.

See Policy Trauma-Informed Care and policy Trauma-Informed Care (Child Safe)

Sandstone will apply the following principles for supporting children when responding to reasonable belief that child abuse has occurred:

- The safety of the child is paramount to all procedures
- Children will be treated with dignity and respect, and their views, feelings and experiences validated
- Every allegation of abuse will be considered and taken seriously
- Confidentiality is respected, however will not be a barrier to action

Sandstone recognises that incidents of abuse may have broad and traumatic impact for all affected. Sandstone will ensure that all persons affected by an incident of abuse, including workers, the Board and others, will be provided with access to appropriate medical assistance, counselling and additional services.

Risk Management

Sandstone will ensure that child safety is included in the overall risk management approach.

Responsibility

The CEO is responsible for the implementation and review of this policy.

Related Documents

1.11 Privacy
1.12 Confidentiality
9.7 Human Rights
5.21 Discrimination, Harassment and Bullying
10.1 Risk Management
5.2 Staff Recruitment, Selection and Appointment
1.14 Child Safe Code of Conduct
1.10 Staff Code of Ethics & Conduct
5.24 Counselling Supervision
1.13 Board Code of Ethics and Conduct
9.22 Safeguarding Vulnerable People
9.31 Child Safe Complaints Handling
9.5 Duty of Care
5.27 Diversity and Cultural Inclusion
Handbook 11 Information Technology, Communication and Data & Knowledge Management
10.6 Policy Risk Management (Child Safe)
5.10 Accidents and Incidents
9.24 Trauma Informed Care
9.25 Trauma Informed Care (Child Safe)
5.16 Under-Performance and Misconduct

Legislation

Care and Protection of Children Act 2007 (NT)
Domestic and Family Violence Act 2007 (NT)