

Lane Cove Music Education Co-op

# Complaints and Child Protection Policies

# Complaints policy

## 1. Introduction

### 1.1 Purpose

This policy is intended to ensure that the Lane Cove Music Education Co-op Ltd handles complaints fairly, efficiently and effectively.

Our complaint management system is intended to:

- enable us to respond to issues raised by people making complaints in a timely and cost-effective way
- boost public confidence in our administrative process, and
- provide information that can be used by us to deliver quality improvements in our services, systems and complaint handling.

This policy provides guidance to our staff and people who wish to make a complaint on the key principles and concepts of our complaint management system.

### 1.2 Scope

This policy applies to all staff receiving or managing complaints from the public made to or about us, regarding our services, staff and complaint handling.

### 1.3 Organisational commitment

The Lane Cove Music Education Co-op Limited expects office holders, members and staff to be committed to fair, effective and efficient complaint handling.

The following table outlines the nature of the commitment expected and the way that commitment should be implemented.

Who	Commitment	How
<b>Board of Lane Cove Music Education Co-op Ltd</b>	Promote a culture that values complaints and their effective resolution	<ul style="list-style-type: none"><li>• Provide adequate support and direction to key staff responsible for handling complaints.</li><li>• Regularly review reports about complaint trends and issues arising from complaints.</li><li>• Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.</li><li>• Encourage staff to make recommendations for system improvements.</li><li>• Recognise and reward good complaint handling by staff.</li><li>• Support recommendations for service, staff and complaint handling</li></ul>

		improvements arising from analysis of complaint data.
<b>Director responsible for complaint handling</b>	Establish and manage our complaint management system.	<ul style="list-style-type: none"> <li>• Provide regular reports to board on issues arising from complaint handling work.</li> <li>• Ensure recommendations arising out of complaint data analysis are canvassed with [the head of the organisation] and implemented where appropriate.</li> <li>• Recruit, train and empower staff to resolve complaints promptly and in accordance with Lane Cove Music Education Co-op Ltd's policies and procedures.</li> <li>• Encourage staff managing complaints to provide suggestions on ways to improve the organisation's complaint management system.</li> <li>• Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.</li> <li>• Recognise and reward good complaint handling by staff.</li> </ul>
<b>Staff whose duties include complaint handling</b>	Demonstrate exemplary complaint handling practices	<ul style="list-style-type: none"> <li>• Treat all people with respect, including people who make complaints.</li> <li>• Assist people make a complaint, if needed.</li> <li>• Comply with this policy and its associated procedures.</li> <li>• Keep informed about best practice in complaint handling.</li> <li>• Provide feedback to management on issues arising from complaints.</li> <li>• Provide suggestions to management on ways to improve the organisation's complaints management system.</li> <li>• Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.</li> </ul>
<b>All staff</b>	Understand and comply with the Co-op's complaint handling practices.	<ul style="list-style-type: none"> <li>• Treat all people with respect, including people who make complaints.</li> <li>• Be aware of Lane Cove Music Education Co-op Ltd's complaint handling policies and procedures.</li> </ul>

		<ul style="list-style-type: none"> <li>• Assist people who wish to make complaints access the Lane Cove Music Education Co-op Ltd's complaints process.</li> <li>• Be alert to complaints and assist staff handling complaints resolve matters promptly.</li> <li>• Provide feedback to management on issues arising from complaints.</li> <li>• Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.</li> </ul>
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## 2. Terms and definitions

### Complaint

Expression of dissatisfaction made to or about us, our services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

A complaint covered by this Policy can be distinguished from:

- responses to requests for feedback about the standard of our service provision (see the definition of 'feedback' below)
- reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response (see definition of 'feedback')
- service requests (see definition of 'service request' below), and
- requests for information (see our access to information policy).

### Complaint management system

All policies, procedures, practices, staff, hardware and software used by us in the management of complaints.

### Dispute

An unresolved complaint escalated either within or outside of our organisation.

### Feedback

Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, about our products [where relevant], services or complaint handling where a response is not explicitly or implicitly expected or legally required.

### Service request

The definition of a service request will vary depending on the organisation's core business. However, it is likely to include:

- requests for approval
- requests for action
- routine inquiries about the organisation's business
- requests for the provision of services and assistance
- reports of failure to comply with laws regulated by the organisation
- requests for explanation of policies, procedures and decisions.

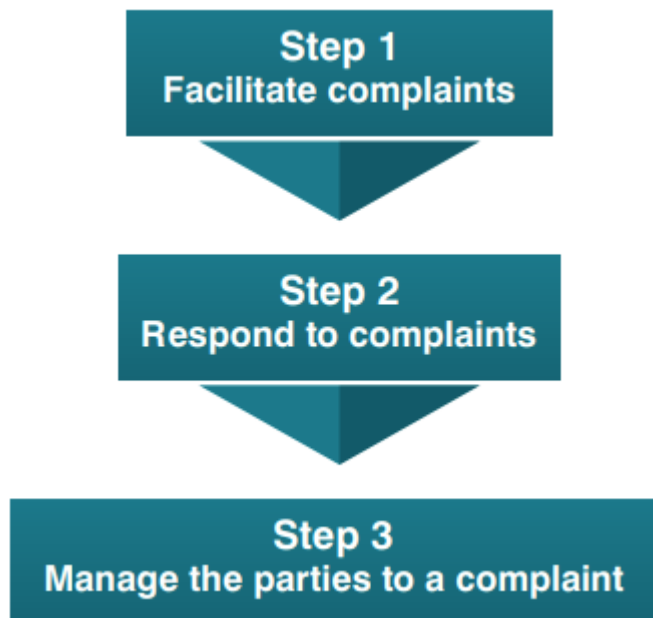
Policy

A statement of instruction that sets out how we should fulfil our vision, mission and goals.

Procedure

A statement or instruction that sets out how our policies will be implemented and by whom.

### 3. Guiding principles



#### 3.1 Facilitate complaints

##### *People focus*

We are committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products and complaint handling.

Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame.

People making complaints will be:

- provided with information about our complaint handling process
- provided with multiple and accessible ways to make complaints
- listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate, and
- provided with reasons for our decision/s and any options for redress or review.

##### *No detriment to people making complaints*

We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

##### *Anonymous complaints*

We accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.

##### *Accessibility*

We will ensure that information about how and where complaints may be made to or about us is well publicised. We will ensure that our systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance.

## 3.2 Respond to complaints

### *Early resolution*

Where possible, complaints will be resolved at first contact with Lane Cove Music Education Co-op Ltd.

### *Responsiveness*

We will promptly acknowledge receipt of complaints.

We will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

We are committed to managing people's expectations, and will inform them as soon as possible, of the following:

- the complaints process
- the expected time frames for our actions
- the progress of the complaint and reasons for any delay
- their likely involvement in the process, and
- the possible or likely outcome of their complaint.

We will advise people as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).

We will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaint and the reason for our delay.

### *Objectivity and fairness*

We will address each complaint with integrity and in an equitable, objective and unbiased manner.

The person handling the complaint will be different from any staff member whose service or conduct is being complained about. Conflicts of interests, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

### *Responding flexibly*

Our staff are empowered to resolve complaints promptly and with as little formality as possible. We will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

We will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

### *Confidentiality*

We will protect the identity of people making complaints where this is practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by the Lane Cove Music Education Co-op Ltd as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

## 3.3 Manage the parties to a complaint

### *Complaints involving multiple parties*

When similar complaints are made by related parties we will try to arrange to communicate with a single representative of the group.

### *Empowerment of staff*

All staff managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities.

Staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

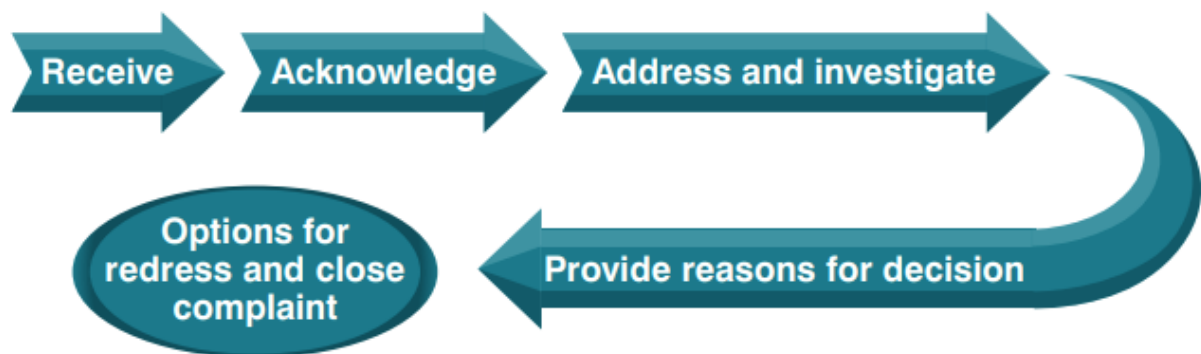
### *Managing unreasonable conduct by people making complaints*

We are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- our ability to do our work and perform our functions in the most effective and efficient way possible
- the health, safety and security of our staff, and
- our ability to allocate our resources fairly across all the complaints we receive.

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy.

## 4. Complaint management system



### 4.1 Introduction

When responding to complaints, staff should act in accordance with our complaint handling procedures as well as any other internal documents providing guidance on the management of complaints. Staff should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

The five key stages in our complaint management system are set out below.

### 4.2 Receipt of complaints

Unless the complaint has been resolved at the outset, we will record the complaint and its supporting information. We will also assign a unique identifier to the complaint file.

The record of the complaint will document:

- the contact information of the person making a complaint
- issues raised by the person making a complaint and the outcome/s they want
- any other relevant information, and
- any additional support the person making a complaint requires.

### 4.3 Acknowledgement of complaints

We will acknowledge receipt of each complaint promptly, and preferably within 5 working days. Consideration will be given to the most appropriate medium (e.g., email, letter) for communicating with the person making a complaint.

### 4.4 Initial assessment and addressing of complaints

#### *Initial assessment*

After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control. We will also consider the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

When determining how a complaint will be managed, we will consider:

- how serious, complicated or urgent the complaint is
- whether the complaint raises concerns about people's health and safety
- how the person making the complaint is being affected
- the risks involved if resolution of the complaint is delayed, and
- whether a resolution requires the involvement of other organisations.

#### *Addressing complaints*

After assessing the complaint, we will consider how to manage it. To manage a complaint, we may:

- give the person information or an explanation
- gather information from the person or area that the complaint is about, or
- investigate the claims made in the complaint.

We will keep the person making the complaint up to date on our progress particularly if there are any delays.

We will also communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case and take into account any statutory requirements.

### 4.5 Providing reasons for decisions

Following consideration of the complaint and any investigation into the issues raised, we will contact the person making the complaint and advise them:

- the outcome of the complaint and any action we took
- the reason/s for our decision
- the remedy or resolution/s that we have proposed or put in place, and
- any options for review that may be available to the complainant, such as an internal review, external review or appeal.

If in the course of investigation, we make any adverse findings about a particular individual, we will consider any applicable privacy obligations under the *Privacy and Personal Information Protection Act 1998* and any applicable exemptions in or made pursuant to that Act, before sharing our findings with the person making the complaint.

### 4.6 Closing the complaint, record keeping, redress and review

We will keep comprehensive records about:

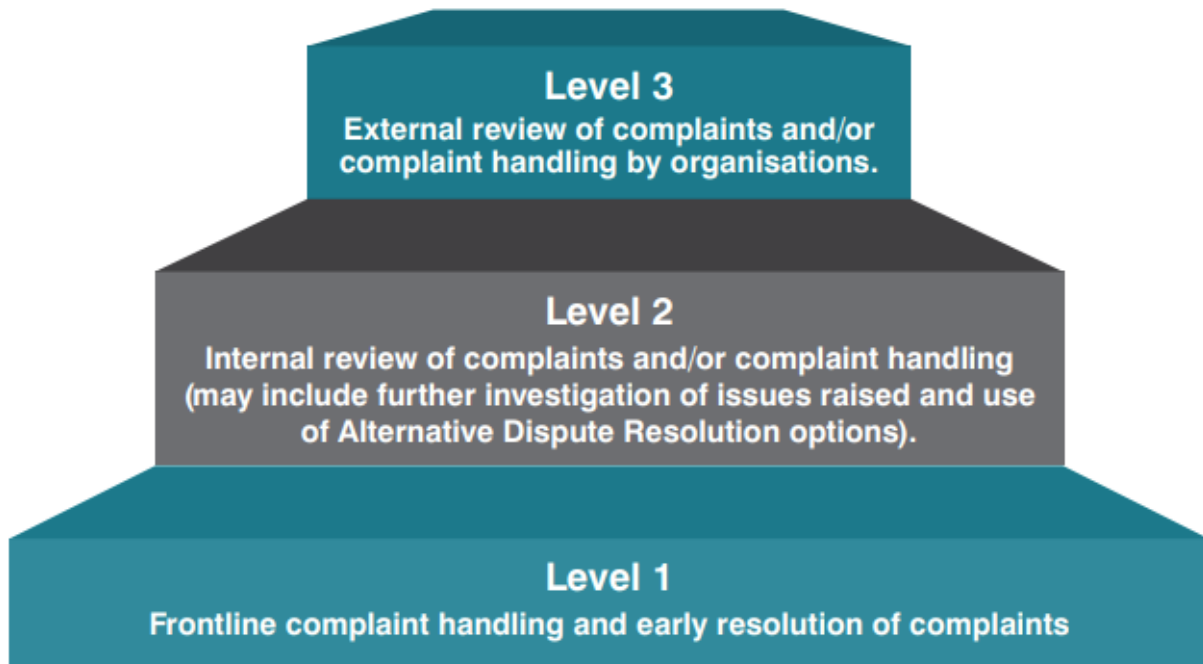
- how we managed the complaint



- the outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations, and
- any outstanding actions that need to be followed up.

We will ensure that outcomes are properly implemented, monitored and reported to the complaint handling manager and/or senior management.

#### 4.7 The three levels of complaint handling



We aim to resolve complaints at the first level, the frontline. Wherever possible staff will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

Where this is not possible, we may decide to escalate the complaint to a more senior officer within [organisation name]. This second level of complaint handling will provide for the following internal mechanisms:

- assessment and possible investigation of the complaint and decision/s already made, and/or
- facilitated resolution (where a person not connected with the complaint reviews the matter and attempts

to find an outcome acceptable to the relevant parties).

## 5. Accountability and learning

### 5.1 Analysis and evaluation of complaints

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Regular reports will be run on:

- the number of complaints received
- the outcome of complaints, including matters resolved at the frontline
- issues arising from complaints
- systemic issues identified, and

- the number of requests we receive for internal and/or external review of our complaint handling.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

Both reports and their analysis will be provided to [organisation name]'s CEO and senior management for review.

#### 5.2 Monitoring of the complaint management system

We will continually monitor our complaint management system to:

- ensure effectiveness in responding to and resolving complaints, and
- identify and correct deficiencies in the operation of the system.

Monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

#### 5.3 Continuous improvement

We are committed to improving the effectiveness and efficiency of our complaint management system. To this end, we will:

- support the making and appropriate resolution of complaints
- implement best practices in complaint handling
- recognise and reward exemplary complaint handling by staff
- regularly review the complaints management system and complaints data, and
- implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

Certificate of registration as a child-related employer on the Working with Children Check system.



## You are now registered as a child-related employer

Employer ID: REG0059651

You are now registered as a child-related employer on the Working With Children Check system.

Your registered details are as follows:

Employer ID	REG0059651
Employer Name	Lane Cove Music Education Co-op Ltd
ABN Number	
Date Registered	19/10/2022
Contact Name	Joseph Zarb
Account User Name	lanecove.musiced@gmail.com
Account Email Address	lanecove.musiced@gmail.com

You now need to [log onto our system](#) and register all of your employees who work in child-related roles, to verify their Working With Children Check status. They must supply you with their Working With Children Check number or an application number. Their names and date of birth should appear as they do on their proof of identity documents. Please be sure to keep a record that you have done this.

You can use the [Working With Children Check record keeping template here](#).

Our system provides free ongoing monitoring and we will notify you should anyone's status change.

[Print receipt](#)

The Office of the Children's Guardian is an independent statutory authority in NSW Government. We protect children in NSW by promoting and regulating quality, child safe organisations and services.

## Child Safe Policy

### Purpose

The purpose of the Lane Cove Music Education Co-op Ltd Child Safe Policy is to:

- demonstrate commitment to the safety and welfare of children and young people
- minimise the risk of abuse, misconduct and misuse of positional power
- inform all staff and volunteers of their obligations and responsibilities in keeping children safe.

### Scope and audience

This policy covers all activities conducted by the Co-op that relate to children. It applies to all:

- Co-op members
- non-member directors
- people in leadership roles
- staff members
- volunteers
- contractors
- children and young people
- families, carers and communities.

### Responsibilities

Position	Responsibility
Board Members	<ul style="list-style-type: none"><li>○ Implement Child Safe policy and procedures across the Program.</li><li>○ Ensure tutors, members, employees, volunteers and contractors have access to and understand this policy and related procedures.</li><li>○ Communicate any updates to this policy and supporting resources with relevant stakeholders.</li><li>○ Provide training and advice in the application of this policy and supporting resources.</li></ul>
Tutors, members, employees, contractors and volunteers	<ul style="list-style-type: none"><li>○ Comply with this policy and any supporting resources.</li><li>○ Report any breach of the policy, whether by themselves, or another.</li></ul>

### Statement of Commitment to Child Safety

The Lane Cove Music Education Co-op Ltd, its members, officers, employees and agents are committed to child safety and, in particular, to minimising the risk of abuse, misconduct and misuse of positional power.

### 1. Child safety is embedded in organisational leadership, governance and culture

We have an explicit commitment to ensuring the physical and emotional safety of the children we teach. Every Co-op member, employee or contractor must have a verified and current Working with Children (WWC) check.

Our senior tutors model child safe behaviour by:

- maintaining formal and correct relationships with children
- speaking in a manner that is calm and friendly but not overfamiliar, including avoiding swearing and inappropriate language
- maintaining correct physical distance.

### 2. Children participate in decisions affecting them and are taken seriously

Every aspect of the child's music education is considered from the child's point of view and, where appropriate, in consultation with the child. This ranges from the time schedule of the lesson, to where they sit in a room, we ask and listen to our students.

We also take our student's concerns about peers, tutors, volunteers, employees, contractors and others associated with the Program seriously. This includes reporting any suspicious or potentially inappropriate behaviour in line with this policy.

### 3. Families and communities are informed and involved

A parent, guardian or authorised adult is highly recommended to be present at individual lessons. We also require at least one parent per week to attend ensemble and group sessions. We communicate this to parents at the start of each term, as well as in an ongoing manner through email correspondence.

### 4. Equity is upheld and diverse needs are taken into account

Catering for differences in learning styles and cultural considerations is very important to the members of the Lane Cove Music Education Co-op. We identify needs by observation and by consultation with parents and classroom teachers. We respond with creative solutions. These solutions are observed by parents and the results are assessed and feedback is given to the head of department.

This has been commented on by classroom teachers. For instance, Johanna Macauley noted:

"Every Monday afternoon, Jose [Zarb] tutors a number of students in my room. He has a wonderful rapport with all of his students and his care and passion shines through in each lesson. Jose's first student is one of the students that I teach. This particular student has difficulty regulating his emotions and concentrating. As a result of my relationship with Jose, I am able to brief him prior to the lesson, regarding whether this student has had a tough or a really good day. Jose seamlessly adjusts his approach in response to this, allowing this student to be supported in the best way possible. This communication between myself and Jose is invaluable and means that the student gets the most out of their lesson. Jose is an asset to our school community."

### 5. People working with children are suitable and supported

Every Co-op member, employee or contractor must have a verified and current WWC check. We perform this in the hiring process as part of any job interview. We also mention our requirements in any job advertisements and note that it is one of our selection criteria.

We provide induction training for all staff and relevant volunteers on their child safety and wellbeing responsibilities. We also provide an annual refresher course at the start of the year, so that all people connected with the Program are aware of their ongoing responsibilities. This includes

highlighting mandatory and external reporting obligations, where someone is made aware of potentially inappropriate behaviour towards a child.

We support our tutors, members, staff and volunteers by ensuring that there is more than one adult present wherever possible. This includes asking parents to attend one-on-one tutor sessions, as well as requiring parent helpers for groups sessions and ensembles. We also explicitly encourage staff to raise any concerns with the Co-Op directors.

#### 6. Processes to respond to complaints of child abuse are child-focused

When responding to any complaint of child abuse, we follow the Australian Government's [Complaint Handling Guide](#).

The seriousness and nature of the complaint determine the exact way in which we investigate and manage any complaint. However, we keep the child – via their family – informed of what is happening at each stage of the complaints process. Making sure the child feels safe is our number one priority and we consult directly with them on how we can achieve this, who they want to talk to and where they would like to go.

We attempt to make our complaints system as simple and straightforward as possible, including communicating to children and their families how to make a complaint. We distribute this information via email to families at the start of each year.

Where the complaint involves another child, we monitor the situation to make sure that the potential for similar behaviour to occur in the future is minimised. We also provide training for all members, employees, volunteers, contractors and others on our complaints process, as well as their reporting and privacy obligations. This includes providing explicit training on the different ways children may make disclosures.

#### 7. Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training

We provide annual training to all staff members on children's rights, child development, our safety and wellbeing policies and procedures. This training also covers topics such as how to recognise abuse, how to respond to a disclosure, what constitutes inappropriate behaviour and how to report it, how to respond to child-on-child harmful behaviour, how to keep proper records, external reporting obligations, and creating culturally safe environments.

We provide resources to all members, employees, contractors and volunteers, including this policy. We also conduct ongoing training, including an annual refresher course, and encourage staff to attend any relevant education sessions conducted by the Office of the Children's Guardian (OCG).

We also make sure all members, employees, contractors and volunteers who disclose harm or risk to children or young people are adequately supported. We do this by keeping written notes the document our interactions, maintaining confidentiality and privacy and encouraging professional intervention where appropriate.

#### 8. Physical and online environments minimise the opportunity for abuse to occur

In general, lessons are conducted at Lane Cove Public School in open-door classrooms in the presence of parents and/or siblings and/or LCPS classroom teachers. If a lesson is to be conducted on zoom for example, this is done with the supervision of a parent.

Specifically, volunteers, employees, members and contractors must not:

- Provide unauthorised transportation to lessons, events, rehearsals or camps. The Co-op must provide written authorisation before this can occur.
- Provide any unwanted or inappropriate support to a student or their family, that is unrelated to the activities of the Music Program.

- Seek contact with students, their families or former participants outside authorised programs/activities, either via social media or any other means
- Engage in activities with students outside authorised programs or activities, unless they have the full knowledge and acceptance of the parent or guardian.
- Accept an invitation to attend any private social function at a student's request without the full knowledge, acceptance or invitation of the parent or guardian.
- Invite a student or past student to attend any private social function without the full knowledge and acceptance of the parent or guardian.

9. Implementation of the Child Safe Standards is continuously reviewed and improved

The agenda of every Co-op meeting is widely publicised and includes specific discussion on the practical aspects of this issue.

We actively relay updates from the Dept of Education, the OCG, School Principal and teaching staff to our members, employees, contractors and volunteers via text and email.

We are committed to always refining and improving our Child Safe Standards. This includes, where appropriate, using surveys and other methods to review processes. We also ask for feedback on our complaints and investigation procedures whenever they are invoked.

Finally, we keep all records and carry out reviews of this information at least annually to identify any systemic weaknesses. Where we do identify these, we immediately take consultative measures to improve them, including through the Board and, where appropriate, via the music community more generally.

10. Policies and procedures document how the organisation is child safe.

We make this policy and our Code of Conduct available to all participants in the Program, publishing it on our website and distributing it via email at the start of each year. We also distribute it at inductions and training.

We keep proper records demonstrating that we follow proper procedure.

We review our policy at least annually and after any critical incidents. The Board is responsible for ensuring the review takes place.

We are also mindful of, and adhere to, the following legislation, regulations, standards and principals:

- [Children's Guardian Act 2019](#) (NSW) and [Children's Guardian Regulation 2022](#) (NSW)
- [Child Protection \(Working with Children\) Act 2012](#) (NSW) and [Child Protection \(Working with Children\) Regulation 2013](#) (NSW)
- [Children and Young Persons \(Care and Protection\) Act 1998](#) (NSW)
- [Crimes Act 1900](#) (NSW)
- [Children and Young Persons \(Care and Protection\) Regulation 2022](#) (NSW)
- [Disability Inclusion Act 2014](#) (NSW)
- [Anti-Discrimination Act 1977](#) (NSW)
- [National Principles for Child Safe Organisations](#)
- [Child Safe Standards](#)
  - [A guide to the Child Safe Standards](#) (NSW Government, Office of the Children's Guardian)
- [Convention on the Rights of the Child](#)
- [UNICEF child-friendly version of the Convention on the Rights of the Child](#)

## Code of Conduct

All members and paid and unpaid staff, including volunteers, interns or trainees of Lane Cove Music Education Co-op Ltd (“the Co-op”) are responsible for the safety and wellbeing of children and young people who engage with Co-op. All members paid and unpaid staff are expected to act in accordance with the Lane Cove Music Education Co-op Ltd Code of Conduct in their physical and online interactions with children and young people under the age of 18 years.

I will:

- act in accordance with the Co-op’s child safety and wellbeing policies and procedures at all times.
- behave respectfully, courteously and ethically towards children and their families and towards other staff.
- listen and respond to the views and concerns of children, particularly if they communicate (verbally or non-verbally) that they do not feel safe or well.
- promote the human rights, safety and wellbeing of all children in Co-op.
- demonstrate appropriate personal and professional boundaries.
- consider and respect the diverse backgrounds and needs of children.
- create an environment that promotes and enables children’s participation and is welcoming, culturally safe and inclusive for all children and their families.
- involve children in making decisions about activities, policies and processes that concern them wherever possible.
- contribute, where appropriate, to the Co-op’s policies, discussions, learning and reviews about child safety and wellbeing.
- identify and mitigate risks to children’s safety and wellbeing as required by the Co-op’s risk assessment and management policy or process.
- respond to any concerns or complaints of child harm or abuse promptly and in line with the Co-op’s policy and procedure for receiving and responding to complaints.
- report all suspected or disclosed child harm or abuse as required by NSW law and by the Co-op’s policy and procedure on internal and external reporting.
- comply with the Co-op’s protocols on communicating with children.

comply with NSW law and the Co-op’s policies and procedures on record keeping and information sharing.

I will NOT:

- engage in any unlawful activity with or in relation to a child.
- engage in any activity that is likely to physically, sexually or emotionally harm a child.
- unlawfully discriminate against any child or their family members.
- be alone with a child unnecessarily.
- arrange personal contact, including online contact, with children I am working with for a purpose unrelated to the Co-op’s activities.
- disclose personal or sensitive information about a child, including images of a child, unless the child and their parent or legal guardian consent or unless I am required to do so by the Co-op’s policy and procedure on reporting.
- use inappropriate language in the presence of children or show or provide children with access to inappropriate images or material.
- work with children while under the influence of alcohol or prohibited drugs.

ignore or disregard any suspected or disclosed child harm or abuse.

If I think this Code of Conduct has been breached by another person in the Co-op I will:



- act to prioritise the best interests of children.
- take actions promptly to ensure that children are safe.
- promptly report any concerns to my manager, the Co-op's Child Safety Officer, the Chief Executive Officer or another manager or leader in the Co-op.
- follow the Co-op's policies and procedures for receiving and responding to complaints and concerns.
- comply with NSW law if relevant, and with the Co-op's policy and procedure on internal and external reporting.

# Child Safe Reporting Policy

## Introduction

- Everyone in the Co-op must report any concerns about the safety or welfare of a child or young person immediately.
- Everyone in the Co-op should be confident that concerns and allegations will be dealt with honestly and fairly.
- Everyone in the Co-op should be confident in reporting unacceptable behaviour around children and young people.
- Where an allegation is made the safety and wellbeing of the child is paramount.

## Reporting obligations

### NSW reporting obligations

#### *NSW Police*

Contact the police on 131 444 for any situation you consider could be a criminal offence. This includes child sexual assault, physical assault and grooming offences. Note: It is a criminal offence for adults not to report to police if they 'know, believe or reasonably ought to know that a child abuse offence has been committed'. In addition, people employed in child-related work may be subject to a criminal offence if they fail to reduce or remove risk of a child becoming a victim of child abuse.

#### *Department of Communities and Justice (DCJ)*

Any person who has reasonable grounds to believe that a child or young person is at risk of significant harm may report to DCJ by phoning 132 111 (this is a 24-hour service).

Mandatory reporters must report if they have reasonable grounds to suspect a child is at risk of significant harm by going to the [ChildStory Reporter Community](#).

A person who is paid to provide the following services and a person (paid or unpaid) who is in a management position in these services are mandatory reporters:

- health care (doctors, nurses)
- education (teachers)
- children's services (childcare centres)
- residential services (refuges)
- law enforcement (police).

#### *Office of the Children's Guardian*

Relevant entities in NSW must report allegations and findings of sexual offences, sexual misconduct, ill-treatment of a child, neglect of a child, an assault against a child, failure to protect a child or failure to report if a child has been harmed, as well as any behaviour that causes significant emotional or psychological harm to a child.

## Types of concerns

All complaints should be reported. This includes:

- disclosures of abuse
- unacceptable behaviour around children and young people

- suspicion of abuse or harm to a child or young person.

### Responsible workers

All complaints must be reported to the child safety contact officers listed here.

[2 child safety contact officers to be selected by the board]

### Raising a concern

A child or young person, or any staff member, volunteer or student can make a complaint or raise a concern by:

- face-to-face meeting with the child safe contact officers or the person in the Co-op responsible for managing child harm allegations
- phone call (see contact numbers on previous page)
- email: email details
- letter: address details.

Note: If you wish to raise a complaint against a child safe contact officer, please contact:

[details to be decided by the board]

### Immediate actions

- Steps are taken to ensure the child is removed from immediate harm, including removing the person the allegation is made about from child-related work if required.
- The incident is recorded on our complaint record form.
- If required, NSW Police and DCJ are contacted and will give us instructions on how to proceed.
- If required, the OCG is contacted and will give advice on how to proceed with an investigation.
- Investigation is carried out in a timely, fair and transparent manner (being mindful of privacy obligations) in line with our policy on responding to child safety reports.
- The child receives information about the investigation process, timeframes and outcome (being mindful of privacy and not compromising any ongoing investigation). The child receives ongoing support from both your organisation and through referrals as needed (for example, counselling).
- After a finding is made, management is to act in accordance with our Responding to Child Safety Reports Policy.
- Critical incident review conducted to improve policies and procedures to prevent the incident reoccurring.

### Privacy and confidentiality

We follow the obligations defined under the *Privacy Act 1988* (Commonwealth).

- All information is recorded on our complaints and allegations reporting form.
- All complaints and allegations reporting forms are stored securely and only accessed by those in the organisation with responsibility for oversight or investigation.
- Information may be exchanged under Chapter 16A of the *Child and Young Persons (Care and Protection) Act 1998* with other agencies who have responsibilities relating to the safety, welfare or wellbeing of children or young persons.
- The privacy of those involved is maintained by the Co-op in accordance with our obligations under the *Privacy and Personal Information Protection Act 1998*.

## Communication and support for stakeholders

We ensure that all our stakeholders (including workers, families and children) know how to raise a concern in the following ways.

- We hold information sessions about our policies and procedures (including this Child Safe Reporting Policy) and how they apply to families, workers and children.
- We create and display our resources (including fact sheets, brochures and posters) that describe what to report and who to report to.
- We provide our staff and volunteers with internal and external training opportunities so they understand our complaints and allegations processes.
- We create and promote age and ability appropriate programs for children and young people that explain what to do if they feel sad, angry or concerned.

## Review date

This policy will be reviewed annually and after critical incidents, to ensure continuous improvement in our practices and that we keep up to date with relevant legislation and industry requirements.

Next review date is [to be determined – on year after formal adoption] and the responsible officer is [to be decided by the board].

Children and young people have an opportunity to provide feedback on the policy and complaint handling process.