Safeguarding Response Policy

Purpose

Our Patch is committed to the safety, health and wellbeing of children who access Our Patch services. This policy sets out how Our Patch prevents, identifies and responds to concerns a child may be experiencing or be at risk of harm or abuse.

The safety and wellbeing of children is our highest priority. Every worker and adult connected to Our Patch shares responsibility for creating an environment where children feel safe, are listened to and are protected from harm.

Our Patch is committed to alignment with Queensland's Child Safe Standards under the *Child Safe Organisations Act 2024 (Qld*), Victoria's Child Safe Standards under the *Child Wellbeing and Safety Act 2005 (Vic)* and the South Australian Child Safe Environment Program and associated reportable conduct schemes.

This policy provides guidance and direction for:

- any reportable allegations of misconduct by Our Patch workers under the Victorian and Queensland Reportable Conduct Schemes,
- serious incidents to be notified to the Regulatory Authority through the National Quality Agenda IT System (NQA ITS),
- any reports of harm and abuse which are reportable to relevant state based Statutory Child Protection body and/or State Police Departments.

It includes information on conducting an investigation and guidance on communication with the relevant statutory body and other external authorities including the Queensland Family and Child Commission (QFCC), the Victorian Social Services Regulator (SSR), the Regulatory Authority (through the NQA ITS), Statutory Child Protection body or Police.

Significant incidents, child harm and abuse concerns and Reportable Conduct applies to all Our Patch workers and all Our Patch activities and services provided to and for children regardless of which State workers and services are based.

Implementation of Our Patch's Safeguarding Policy and associated procedure is guided by the principle the child is at the centre of our decision making and actions.

Reportable Conduct includes a reportable conduct allegation or conviction of reportable conduct by a worker, whether occurring in the course of their duties with Our Patch or outside conduct relating to children.

This policy applies alongside our Code of Conduct, Providing a Child Safe Environment Policy, Complaints Policy and Safeguarding Response Procedure.

Scope

This policy applies to all employed staff, Board members, volunteers, contractors, consultants, labour hire workers, trainees, students and work experience students engaged by Our Patch Group (Schools Plus, Amaze & Our Patch) to assist in its activities.

The term **'worker'** will be used to encompass all engagement types.

The policy covers concerns about harm to a child caused by any person including family members, other children, workers and other adults associated with Our Patch.

Definitions

Child	A person under the age of 18.
Child Abuse	Any form of physical assault, emotional abuse, sexual abuse, misconduct and exploitation, neglect or negligent treatment, commercial (e.g. for financial gain) or other exploitation of a child and includes any actions which result in actual or potential harm to child. This includes any behaviours which cause psychological harm and actions occurring in the past or present.
Harm	Any detrimental effect of a significant nature on a child's physical, psychological or emotional wellbeing. It can be caused by a single act or an accumulation of events and may result from physical, emotional, sexual or psychological abuse, neglect or exposure to domestic and family violence.
Child Protection Concerns	Concerns a child has been abused, may have been abused or has been harmed or is at risk of harm. This includes concerns which may not meet the threshold for intervention by State Child Protection Authorities
Suspicion of harm	A suspicion of harm is when someone has a reasonable suspicion that a child has suffered, is suffering or is at unacceptable risk of suffering significant harm. This includes circumstances which relate to an unborn child who may be in need of protection after he or she is born. A child who has been, or may be experiencing abuse may show behavioural, emotional or physical signs of stress and abuse. A person does not need proof. A genuine reasonably held concern based on what they have seen, been told, or observed is sufficient to trigger a report
Mandatory Reporting	Child Care workers are mandatory reporters and are legally required to report if they have a reasonable belief a child has been

	or is at risk of harm perpetrated by anyone including Our Patch workers, their family, or other adults.
Physical abuse	Generally defined as “any non-accidental injury” to a child. It is any intentional act to cause injury or trauma. It includes injuries such as bruises, broken bones, burns, cuts. Physical abuse does not always leave visible marks or injuries. It can include hitting, shaking, choking, drowning, smothering, throwing, burning, biting, poisoning, using physical restraints.
Emotional abuse	Occurs when a child is treated in a way which negatively impacts their social, emotional or intellectual development. This may include: • Repetitively treating and speaking to a child in ways that damage the child’s ability to feel and express their feelings. • Constant criticism, condescending, teasing of a child, ignoring or withholding admiration and affection. • Excessive or unreasonable demands. • Persistent hostility, severe verbal abuse, and rejection. • Belief that a specific child is bad or “evil”. • Using inappropriate physical or social isolation as punishment. • Exposure to domestic violence. • Not giving the child any support or positive encouragement.
Neglect	A child’s basic needs for their growth and development are not met, such as food, clothing, shelter, medical, dental care and adequate supervision. Neglect can be physical, emotional, medical, educational or supervisory. Some examples are: • Not providing the child with sufficient food. • Not providing the child with enough sleep. • Not providing the child with adequate hygiene. • Leaving the child alone for extended periods of time.

	• Not providing for the child's health and medical needs.
Sexual abuse	Occurs when an adult or older child uses a child for sexual stimulation and/ or engages them in sexual activity. Can be physical, verbal and emotional. Sexual abuse can include flashing, talking in a sexual way, kissing or fondling a child, exposing genitals to a child, making obscene phone calls, sending sexually explicit messages via email or text to a child, exposing a child to pornography or other sexually inappropriate material.
Grooming	Refers to befriending and establishing an emotional connection to a child and/or family to lower the child and family's inhibitions with the objective of sexually abusing a child. Grooming is often subtle and includes gaining the trust of a child, the trust of a parent or caregiver allowing them to be left alone with a child.
Online abuse	Is any abuse which occurs via technology and can happen anywhere where digital communication occurs. It can include bullying, sexual abuse, encouraging a child to share inappropriate material, exposure to grooming.
Domestic and Family Violence	Includes acts of physical violence, coercive control and non-physical forms of abuse such as social, sexual, financial, emotional and technology-based abuse. Domestic and family violence occurs when one person in an intimate, romantic, family or informal care relationship uses violence or abuse to control another person. Children are particularly vulnerable to either witnessing violence perpetrated on another or being victims of physical and emotional injuries.
Bullying	Bullying involves the inappropriate use of power by one or more persons over another person or group and is generally an act that is repeated over time. Bullying has been described by researchers as taking many forms which are often interrelated and include: • Verbal (name calling, put downs, threats) • Physical (hitting, punching, kicking, scratching, tripping, spitting) • Social (ignoring, excluding, ostracising, alienating) and/or

	• Psychological (spreading rumours, stalking, dirty looks, hiding or damaging possessions)
Procedural Fairness (Natural Justice)	Also called natural justice. It is the principle that decisions affecting a person's rights, interests or legitimate expectations are made through a fair process. It includes the right to be heard and having a decision maker who is impartial. Employees will be informed of the substance of the allegations, given reasonable opportunity to respond, given the opportunity to have a support person (where appropriate). Natural justice does not require notifying the subject before the regulatory authority has been notified. Natural justice does not require sharing the identity of the person who raised the allegation, where doing so could compromise the safety of a child or the integrity of the investigation.
Reportable Conduct	• As defined in the *Child Safe Organisations Act 2024 (Qld).* It includes: • A child sexual offence • Sexual misconduct committed in relation to, or in the presence of a child • ill-treatment of a child • significant neglect of a child • Physical violence committed in relation to, or in the presence of a child • Behaviour that causes significant emotional or psychological harm to a child. As defined in the *Child Wellbeing and Safety Act 2005 (Vic).* It includes: • Sexual offences (against, with or in the presence of a child) • Sexual misconduct (against, with or in the presence of a child)

	• Physical violence (against, with or in the presence of a child) • Behaviour that causes significant emotional or psychological harm • Significant neglect Our Patch recognises South Australia does not have a reportable conduct scheme and is guided by the National Principles for Child Safe Organisations, which requires Our Patch to comply with The Child Safe Environments Program. This means children and young people are protected, feel respected, valued and encouraged to reach their full potential. Therefore, Our Patch will report all allegations and concerns of child harm to either the police or the Department for Child Protection (South Australia). Staff from South Australia will report all allegations of harm and abuse by a worker using the significant incident report form.
Reportable Allegation	• A reportable allegation is an allegation or other information that leads to a person to form a reasonable belief that a worker of a reporting entity has committed: a. Reportable conduct; or b. Misconduct that may involve reportable conduct.
Reportable Conviction	• A reportable conviction of a worker of a reporting entity is a conviction for an offence committed by the worker against a law of a State or the Commonwealth that may involve reportable conduct.
Reporting Entity	As a service which cares for, supervises and exercises authority over children. Our Patch is considered a reporting entity under the *Child Safe Organisations Act 2024 Section 29 (Qld)* and *Child Wellbeing and Safety Act 2005 (Vic)*
National Quality Agenda Information	An online tool offering providers secure direct communication with regulatory authorities. It connects approved providers directly with the state and territory regulatory authorities

Technology System (NQA ITS)	

Roles and Responsibilities

Delegations

The Chief Executive Officer (CEO) is responsible for oversight of the Safeguarding Response Policy on behalf of the organisation. This responsibility is delegated to the Head of Safeguarding and Compliance (HSC) but does not negate the CEO's responsibility as head of the organisation. If the HSC is not available the CEO will direct responsibility.

Responsibilities

The **Chief Executive Officer (CEO)** will:

- hold overall accountability for child safety,
- ensure this policy is implemented, resourced and reviewed,
- ensure all allegations of child harm are reported,
- ensure Our Patch meets all obligations under the Child Safe Organisations Act 2024 (Qld) and the Child Wellbeing and Safety Act 2005 (Vic),
- champion a child safe culture within Our Patch in conjunction with the HSC, ensuring all levels follow Our Patch values,
- ensure the safety and wellbeing of children who use Our Patch services,
- be the final decision maker when determining outcomes of any investigation.

The **Head of Safeguarding and Compliance (HSC)** will:

- accept delegation of safeguarding responses as directed by the CEO,
- ensure Our Patch's safeguarding systems, policies and procedures are up to date,
- ensure the organisation complies with any additional external / legislative reporting requirements that may arise,
- inform the relevant statutory bodies (e.g. Police, Child Protection) if applicable,
- receive and discuss reports of child protection concerns with Our Patch workers prior to reporting to the relevant child protection authority,
- conduct risk assessments following reports of concern relating to our workers,
- review any risk assessments and safety plans

- arrange child interviews only where necessary, conducted by a skilled, trauma-informed interviewer, with a parent or support person present unless they are implicated or their presence is not in the child's interests,
- oversee reporting and investigation of reportable conduct allegations and convictions with the support of the Head of Talent and HR Operations,
- support the Head of Talent and HR Operations with staff interviews,
- identify any child safety risks and support the Chief Operating Officer (COO) in mitigating the risks,
- manage reporting to the QFCC and SSR as a delegate of the CEO if the matter is reportable conduct.

The **Head of Talent and HR Operations** will:

- oversee any workplace investigation interviews in conjunction with HSC,
- ensure industrial relations and employee obligations are met,
- send letters to worker/workers to inform them of any stand down which may occur,
- ensure workers have a support person assigned to check in on their wellbeing during the investigation process,
- contribute to and guide action planning following an investigation,
- oversee worker child safe training,
- ensure all working with children screening checks are completed, monitored and recorded including maintaining a working with children screening check register,
- conduct investigation review meeting in conjunction with the HSC and COO before recommendations are finalised.
- ensure all workers complete child protection and child safeguarding training and maintain training records and register.

The **Chief Operating Officer (COO)** will:

- provide direction, supervision and support to any Our Patch worker
- ensure Our Patch workers understand their reporting obligations,
- if applicable, be part of the initial investigation meeting to discuss next steps,
- oversee the operations component of the investigation,

- ensure any concerns are reported to the HSC and Head of Talent and HR Operations,
- action outcomes from investigations relating to staff,
- oversee the development of any risk assessments and safety plans,
- coordinate personnel performance management and disciplinary procedures with the support of the Head of Talent and HR Operations.

Area Managers will:

- support Educators and Service Leaders in understanding and reporting child protection, child safety and wellbeing concerns,
- advise the HSC should a report of child harm be received,
- advise the Service Leader to not investigate independently or interview the child.
- support Educators and Service Leaders following a reportable conduct concern being raised,
- immediately advise and escalate any concern to the COO and HSC,
- gather information at a service level to inform any investigation,
- assist the Service Leader to implement safety and risk management plans,
- support the COO to action approved recommendations from investigations,
- assist with information gathering from a service level to inform the investigation.

Service Leaders/ Nominated Supervisors (NS) will:

- ensure shifts are covered if workers are stood down,
- support educators to understand what child harm is and what reportable conduct is,
- complete the significant incident report,
- implement safety and risk management plans.

Workers/Educators will:

- understand what the indicators of harm are,
- report to their Service Leader about concerns about child harm,
- report to their Service Leader any concerns, allegations or convictions including but not limited to sexual misconduct, serious physical assault, ill-treatment, neglect or

any behaviour which causes psychological harm committed against a child by a person who volunteers, is employed or contracted to Our Patch,

- adhere to Our Patch's Code of Conduct, this policy and related child safe policies,
- under the direction of their Service Leader, support any child who has been impacted and their family as applicable and appropriate.
- understand what reportable conduct is and the importance of reporting,
- complete a factual file note, recording child's words,
- cooperate with any investigations, including attendance at interviews.

Policy Statement

Our Patch is committed to preventing child abuse and promoting and protecting the safety and wellbeing of children. Our Patch will:

- Uphold the National Child Safe Standards and relevant State based Child Safe Standards.
- Uphold the rights of children as set out in the United Nations Convention of the Rights of the Child.
- Take actions to prevent harm and minimise the risk of harm or abuse to a child.
- Support all Our Patch workers to comply with reporting obligations.
- Report child abuse or risk of child abuse immediately to the relevant authority including the police.
- Identify and respond promptly and appropriately to child protection concerns, child abuse, harm or risk of harm.

Any form of risk and risk of harm towards children will not be tolerated and immediate action will be taken upon report of any suspected harmful or abusive behaviours.

Prevention

Prevention reduces the likelihood that harm occurs and makes it easier for children and adults to raise concerns safely and in a timely manner. Our Patch:

- ensures no worker starts work without a valid working with children check,
- has a Code of Conduct which describes expected behaviour towards children, including boundaries for communication, supervision, physical contact, photography and social media and other digital contact.
- provides mandatory child safe training for all workers, that is kept up to date
- establishes and maintains safe physical and online environments including supervision, minimum ratios are maintained, visitor sign in and monitored digital communication channels.
- provides regular age-appropriate education to children about their right to be and feel safe and how and to whom to raise a concern,
- includes children in decision making regarding any programs or other matters affecting them.

All children and families accessing Our Patch programs, activities and events are informed of our responsibilities to report child abuse and harm and the process for reporting harm.

Recognising signs of harm and identifying concerns

There are common physical and behavioural signs which may indicate abuse or neglect. There may be many reasons a child's behaviour can change or various explanations. A single worrying sign may not mean a child has been abused, however multiple signs may suggest abuse and/or neglect. Workers are encouraged to discuss with the Service Leader and/or the Safeguarding and Compliance Team any concerns they may have.

If unsure, workers should discuss with the Safeguarding and Compliance Team or their Service Leader

Workers assess indicators of abuse and harm based on:

- observations of the child and/or family,
- disclosures made by the child,
- a parent's disclosures or statements expressing concern about hurting a child,
- a child alludes to secrets,
- physical injuries such as bruising, lacerations, bite marks, burns etcetera, with explanations not consistent with the injury,
- a delay in seeking medical advice,
- aggressive behaviour such as bullying, sleep disturbances, anxiety, depression, cruelty to animals, difficulty forming relationships,
- sexual knowledge beyond their age and/or developmental stage, sexually explicit drawings,
- poor hygiene, hunger, untreated medical or dental needs,
- a child presents as fearful or hypervigilant.
- A concern about harm from an Our Patch worker may occur through observations made by other staff, children's behaviour, a complaint or a whistleblower response.
- Indicators of grooming include:
    - a child being given special attention,
    - an adult attempting to spend excessive time alone with the child,
    - giving the child or their family gifts,
    - offering to babysit or take the child on outings

- desensitisation through introducing sexual topics, making sexualised jokes, exposing the child to pornography

- Concerns about a child or young person's wellbeing and safety could be identified in different ways including:
  - A disclosure of abuse made by a child about themselves, another young person or another person,
  - A worker forming a suspicion a child has been abused, harmed or at risk of harm because injuries or symptoms, concerning behaviour by the child, concerning behaviour by an adult towards the child.

Responding to a concern or disclosure

Child Care workers are mandated reporters therefore all Our Patch workers are required to report any child protection concerns about the safety and wellbeing or risk to a child's safety immediately to the Safeguarding and Compliance Team using the Significant Incident Report and by following the Safeguarding Response Procedure.

Reportable Conduct

Queensland's Reportable Conduct Scheme commenced on 1 July 2026. The scheme is mandated under the Child Safe Organisations Act and administered by the Queensland Family and Child Commission (QFCC). The QFCC has oversight of the Reportable Conduct Scheme and can monitor how Our Patch responds to any allegations of child abuse by Our Patch workers.

Victoria's Reportable Conduct Scheme is mandated under the Child Wellbeing and Safety Act 2005 (Vic) and administered by the Social Services Regulator (SSR).

The purpose of Reportable Conduct Schemes is to improve an organisations identification and response to allegations of child abuse and neglect by their workers.

Child Safe Standards and Reportable Conduct Schemes strengthen Our Patch's capacity to prevent and respond to allegations of child abuse. To meet its obligations for safeguarding, Our Patch has:

- Strategies and systems to prevent reportable conduct by workers.
- Systems for reporting and investigating allegations or convictions of reportable conduct.
- Processes to ensure the safety and wellbeing of children in contact with Our Patch.
- A willingness and ability to cooperate with the QFCC and the SSR and other relevant authorities should reportable conduct occur.

Our Patch is committed to providing an environment where:

- The safety and wellbeing of children and their families is protected,
- Children are supported to live free from harm, abuse and neglect,
- Incidents of actual or suspected harm to children who use our services are identified and responded to,
- Incidents of actual or suspected harm to children who use our services are recorded and escalated in line with our contractual and legislative responsibilities,
- All allegations are treated seriously and consistently in line with legislation and our duty of care to protect children from harm, this policy and the code of conduct,
- Obligations for notifiable disclosures are adhered to.

Reporting to the Regulatory Authority

Our Patch is committed to ensuring all significant incidents and complaints about child harm and abuse are notified to the Regulatory Authority through the NQA ITS in line with the National Regulations and the timeframes set out in this policy.

Our Patch workers will promptly report incidents using Our Patch's significant incident report form and the HSC will notify the Regulatory Authority through the NQA ITS.

Reporting to Statutory Child Protection Body and/ or Police

All our Patch workers who observe, suspect or become aware of child abuse and harm with the alleged offender being a child's caregiver or parent will report to the relevant State Statutory Child Protection body.

Educators will verbally inform the Service Leader/ Nominated Supervisor, who will inform the Area Manager within one hour. The Area Manager will inform the COO and the Safeguarding and Compliance Team. A significant incident report will be completed prior to the end of their shift.

The Safeguarding and Compliance Team are available to support educators in fulfilling their mandatory obligations to report.

Privacy and confidentiality

As part of Our Patch's professional and ethical responsibilities Our Patch has a duty of care to protect the safety and wellbeing of children. When there are reasonable grounds to suspect a child is at risk of harm, abuse or neglect, this duty will override confidentiality. In this circumstance Our Patch will act in accordance with legislation and mandatory reporting obligations. The primary purpose is ensuring the safety of the child.

Record Keeping

Our Patch will keep a secure register of all child protection concerns raised about Our Patch workers, any breaches of the Code of Conduct and any critical or significant incidents relating to the safety and wellbeing of children.

Staff Support

Working with children who have experienced abuse or harm can have an emotional impact on workers. Our Patch is committed to supporting workers with debriefing and support. Our Patch will make available to all workers the Employee Assistance Program.

Legislative Requirements

This policy supports compliance with:

Regulatory Authority Notification Requirements (via NQA ITS)		
Section 174 (2)a Regulation 12(a)	Serious incident – death of a child	As soon as practicable but within 24 hours
Section 174 (2)a Regulation 12(c)	Serious incident – any incident involving serious illness of a child while being educated or cared for which the child attended or ought reasonably to have attended a hospital	Within 24 hours of the incident or becoming aware of the incident
Section 174(2)(a) Regulation 12(b)	Serious incident - Any incident involving serious injury or trauma to a child while being educated and cared for which the child attended or ought reasonably to have attended a hospital, or a reasonable person would consider that the child would require urgent attention from a registered medical practitioner	Within 24 hours of the incident
Section 174(2)(a) Regulation 12(d)	Serious incident - Any emergency for which emergency services attended	Within 24 hours of the incident
Section 174(2)(a) Regulation 12(e)(i) and 12(e)(ii)	Serious incident - A child appears to be missing or cannot be accounted for or appears to have been removed from the premises in a manner that contravenes the National Regulations	Within 24 hours of the incident
Section 174 (2)a Regulation 12(e) (i) and 12 (e) (ii)	Serious incident – a child is mistakenly locked in or out of the premises or any part of the premises	Within 24 hours of the incident
Section 174(2)(b) Regulation 12	Any complaint alleging that: - a serious incident has occurred or is occurring at an education and care service (refer to Serious Incidents outlined in table above), or - the National Law has been contravened	Within 24 hours of the complaint
Section 174 (2)c Regulation 175 (2) (b)	Any incident that requires the approved provider to close, or reduce the number of children attending the service for a period	Within 24 hours of the incident
Section 174(2)(c) Regulation 175(2)(c)	Any circumstance at the service that poses a risk to the health, safety or wellbeing of a child attending the service	Within 7 days
Section 174(2)(c) Regulation 175(2)(d) Regulation 176 (2)(bb)	Any incident where the approved provider reasonably believes that physical or sexual abuse of a child or children has occurred or is occurring while the child is being educated and cared for by the service	Within 24 hours of the incident or within 24 hours of the approved provider becoming aware of the incident
Section 174(2)(c) Regulation 175(2)(e) Regulation 176 (2)(bc)	Allegations that physical or sexual abuse of a child or children has occurred or is occurring while the child is being educated and cared for by the service	Within 24 hours of the allegation or within 24 hours of the approved provider becoming aware of the allegation
Section 174(2)(c) Regulation 123(5) Regulation 175(2)(ca)	The centre-based service is educating and caring for extra child/ren due to an emergency	Within 24 hours

Related Legislation/Standards	
Child Safe Organisations Act 2024 (Qld)	https://www.legislation.qld.gov.au/view/whole/html/asmade/act-2024-049
Child Safe Regulations 2025 (Qld)	https://www.legislation.qld.gov.au/view/whole/html/asmade/sl-2025-0126
Child Safe Environment Program -SA	https://www.safespacelegal.com.au/child-safe-environments-program-south-australia/
Child Wellbeing and Safety Act 2005 (Vic)	https://www.legislation.vic.gov.au/in-force/acts/child-wellbeing-and-safety-act-2005/046
Child Protection Act 1999 (Qld)	https://www.legislation.qld.gov.au/view/html/inforce/current/act-1999-010
Criminal Code (Child Sexual Offences Reform) and other Legislation Amendment Act 2020 (Qld)	https://www.legislation.qld.gov.au/view/whole/html/asmade/act-2020-032
Children, Youth and Families Act 2005 (Vic)	https://www.legislation.vic.gov.au/in-force/acts/children-youth-and-families-act-2005/148
Children and Young People (Safety) Act 2017 (SA)	https://www.legislation.sa.gov.au/lz?path=/c/a/children%20and%20young%20people%20(safety)%20act%202017
Working with Children (Risk Management and Screening) Act 2000 (Qld)	https://www.legislation.qld.gov.au/view/html/inforce/current/act-2000-060

Document Information	
Document Title	Safeguarding Response Policy
Document Type	Policy
Document ID	POL-003
Version Number	1.1
Effective Date	September 2026
Review Cycle	☒Annual ☐Biennial ☒Trigger Based
Review Date	August 2027
Document Owner	Head of Safeguarding and Compliance
Approved By	Chief Executive Officer
Approval Date	September 2026
Supersedes	
Acknowledgement Required	☒Yes ☐No
Location	ELMO

Related Policies and Procedures	
PRO-3.1	Safeguarding Response Procedure
POL-001	Code of Conduct
POL-002	Providing a Child Safe Environment
POL-008	Complaints and Feedback Policy
POL-009	Privacy and Information Management Policy

Version Control History				
Version	Date	Owner	Description of Changes	Approved by
1.00	12/08/2026	Head of Safeguarding and Compliance		Chief Executive Officer
1.10	Oct 2026	Head of Safeguarding and Compliance	Regulatory Authority references corrected; role titles updated; child interview wording updated; related policies listed	Chief Executive Officer