

Safeguarding Children Policy

Whiddon

Document Control

Title	Safeguarding Children Policy
Version	0.1
Effective Date	23 March 2026
Review Date	August 2028
Initiating service area	Corporate Risk & Compliance
Release Authority	Deputy Chief Executive Officer

Document Review

Date	Description of review	Initiated by	Version
23 March 2026	DRAFT Initial document	Corporate Risk & Compliance	0.1



1. Why this policy matters?

- **Demonstrates commitment** to creating safe respectful and inclusive environments for children
- **Outlines responsibilities** for preventing harm and responding to concerns

2. Who the policy impacts?

Employees, volunteers, contractors, students, and CHSP workers, engaged in roles that involve contact with Children



3. Key Policy Highlights?



- **Worker screening** and secure monitoring by People & Culture – directly meets CHSP quality assurance expectations.
- **Child protection measures** – mandatory supervision, parental consent, child-safe code of conduct, media consent restrictions.
- **Risk management** – annual risk assessments and compliance audits, aligned with CHSP funding principles of proactive risk control.
- **Mandatory reporting** – procedures for NSW and QLD, clear escalation to Police/Child Protection Services.
- **Child-friendly reporting mechanisms** – posters, plain language, school involvement, whistleblower protections.
- **Whiddon ensures alignment**, no child left alone with staff/residents.
- **Recruitment and training** – behavioural interviewing, reference checks, induction, refresher training, specialised training for child-contact roles.

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Safeguarding Children Policy

Introduction

Whiddon is committed to creating safe, respectful, and inclusive environments for all children who engage with our services, including through intergenerational programs, site visits, and community partnerships. This policy outlines our organisational approach to safeguarding children and ensuring compliance with all legal and regulatory obligations in New South Wales, Queensland, and under Commonwealth legislation.

It sets out the responsibilities of Whiddon personnel, contractors, and volunteers in preventing harm, promoting child safety, and responding to concerns. The policy supports our broader commitment to human rights, child-centred care, and the National Principles for Child Safe Organisations.

Purpose

This policy outlines Whiddon's commitment to child safety, including safe recruitment practices, and safeguarding measures for all interactions with children. It also provides specific guidance on our intergenerational programs, child-related media use, and reporting mechanisms to ensure the rights and wellbeing of children are protected at all times.

Whilst Whiddon does not provide child-specific services, contact with children does occur through our intergenerational programs and the purpose of this policy is to outline the requirements for employees and volunteers who may come into contact with children through such programs.

This policy also ensures Whiddon's compliance with the **Commonwealth Home Support Programme (CHSP) Grant Agreement** and the **CHSP Manual (2023–2025)**, which require funded providers to maintain robust child safety and safeguarding arrangements. While Whiddon does not deliver services directly to children, CHSP programs may involve interaction with children and young people in households, through intergenerational programs, or via carers and volunteers. This policy therefore forms part of Whiddon's governance system for meeting CHSP obligations to uphold the safety, dignity, and wellbeing of all people, including children.

1. Policy Statement

Whiddon is unwavering in its commitment to safeguarding the wellbeing, safety, and human rights of all children and vulnerable individuals who engage with our services, programs, and homes. This commitment is embedded across our organisational culture and practices and reflects our legal, ethical, and moral responsibilities.

- The NDIS Worker Screening Check (NDISWSC) for personnel involved in aged care or disability services funded through the NDIS, including those who may also require a WWCC or Blue Card: *[NDIS (Practice Standards—Worker Screening) Rules 2018]*

Whiddon is committed to being a **child safe organisation**, where the rights, safety, participation and voices of children and young people are respected, protected and prioritised in all aspects of our services. We are committed to creating environments where all children — including Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse

backgrounds, children with disability, and those who may be more vulnerable — feel safe, respected, and empowered to participate in decisions that affect their lives. This commitment aligns with the Australian Government’s **Commonwealth Home Support Programme (CHSP) requirements** and the **National Principles for Child Safe Organisations**

All Whiddon personnel involved in child-related work must hold and maintain valid Aged Care clearances prior to commencement. No individual may begin work in a child-contact role without verified screening approval. Screening status is continuously monitored, and records are securely maintained by our People and Culture team.

Whiddon upholds a zero-tolerance approach to any form of abuse, neglect, exploitation, grooming, or misconduct involving children or vulnerable people. Any suspected or alleged incident will be treated with the utmost seriousness and reported promptly to relevant statutory authorities, including Police and Child Protection Services, in accordance with applicable mandatory reporting laws and Whiddon’s internal safeguarding procedures.

Whiddon employees, volunteers, contractors, students, and third-party providers are required to immediately report any concerns, suspicions, disclosures, or allegations of harm, abuse, neglect, grooming, exploitation, or misconduct involving a child or vulnerable person.

- Reports must be made to a line manager or supervisor as soon as practicable, and directly to statutory authorities where mandatory reporting laws apply.
- Failure to report concerns or suspicions is a breach of Whiddon’s Code of Conduct and safeguarding responsibilities and may result in disciplinary action.

To support a culture of safety and accountability, Whiddon has established a Child Safe Code of Conduct that clearly outlines expected behaviours when working with or around children. Compliance with this Code is mandatory for all employees, volunteers, contractors, students, and third-party providers.

Whiddon complies with the annual requirements of safe children compliance statement and will ensure that this is submitted each year by the due date.

Scope

This policy applies to all individuals engaged by Whiddon, including:

- Employees (full-time, part-time, casual)
- Volunteers
- Contractors and subcontractors
- Students
- Community partners and third-party service providers
- Any individual whose role involves direct or indirect contact with children

This policy also applies to children who may be present in the homes of CHSP consumers or otherwise come into contact with Whiddon staff and volunteers during service delivery. This includes younger carers, visiting family members, and children participating in community or intergenerational activities connected to CHSP-funded programs.

Definitions

- Child: Any person under 18 years of age.
- Child-related Work: Paid or volunteer work involving direct contact or responsibility for children.
- WWCC: NSW Working with Children Check clearance.¹
- Blue Card: Queensland’s child-related screening clearance.²
- NDISWSC: NDIS Worker Screening Check clearance.

2. Responsibilities

- Board and Executive Management are responsible for endorsing and supporting this policy, ensuring adequate resources and compliance.
- The Board receives an annual safeguarding report from the General Manager People and Culture that covers incidents, training completion rates, compliance monitoring outcomes, and program risk assessments. This report includes information relevant to CHSP services and demonstrates compliance with CHSP Grant Agreement requirements. Safeguarding performance indicators are integrated into Whiddon’s broader Quality and Risk reporting framework.
- People and Culture are responsible for verifying, recording, and monitoring all worker screening checks, including renewals and expiry dates.
- Managers and Supervisors must ensure all workers in their teams hold valid clearances and understand their obligations under this policy.
- All Workers must comply with screening requirements, notify Whiddon immediately if their clearance status changes, and adhere to child protection standards.
- People and Culture are also responsible for overseeing internal reporting mechanisms, coordinating investigations, and ensuring appropriate corrective action is taken where required
- In addition to legislative requirements, Whiddon applies the **National Principles for Child Safe Organisations (2019)** as the overarching framework for safeguarding children. These 11 principles guide our governance, participation, equity, cultural safety, complaints processes, and continuous improvement. [Appendix C](#) provides a crosswalk between Whiddon’s safeguarding measures and each of the 11 principles.
- The General Manager Corporate Risk and Compliance will attend submission of the annual child safety compliance statement

¹ [See: Child Protection (Working with Children) Act 2012 (NSW)]

² [See: Working with Children (Risk Management and Screening) Act 2000 (QLD) – s.171]

3. Screening Requirements

Whiddon is not a child-specific service provider. However, children may be present in our services through intergenerational programs, family visits, volunteers, or community engagement. To ensure a safe environment, Whiddon applies rigorous screening processes to all staff, volunteers, students, and contractors in line with aged care and NDIS legislative requirements.

Whiddon requires all personnel and volunteers to maintain current clearances and declarations.

4. Child Protection Measures

Whiddon maintains comprehensive child safeguarding procedures including:

- A Child Safe Code of Conduct that outlines required behaviours for all personnel
- Clear guidance on appropriate language, conduct, physical interactions, and supervision of children
- Specific procedures for intergenerational programs, including mandatory supervision by school staff and written consent from parents or guardians
- Media and image use protocols, including parental consent requirements and restrictions on the publication of identifying information

5. Risk Assessment and Compliance Monitoring

- Risk assessments will be undertaken for all programs or activities involving children to proactively identify and mitigate potential risks.
- Whiddon will maintain and review its WorkSafe and insurance arrangements to ensure adequate coverage of intergenerational and child-related programs.
- Regular compliance audits will be conducted to monitor adherence to screening and safeguarding policies.
- Ongoing training and child safety awareness programs will be provided to all staff, volunteers, and contractors.

6. Reporting and Mandatory Notifications

Whiddon is committed to maintaining a safe and protective environment for all people, including children and young people who engage with our services through intergenerational programs, site visits, and volunteer placements. We recognise our duty of care and legal obligations to act promptly and responsibly in response to any concerns or allegations involving the safety or wellbeing of a child.

All Whiddon personnel—including employees, volunteers, and students—must immediately report any suspicion, disclosure, or allegation of child abuse, neglect, grooming, or exploitation. Whiddon’s reporting processes are designed to uphold child safety, ensure compliance with mandatory reporting laws in New South Wales and Queensland, and provide clear, confidential, and accessible pathways for raising concerns.

The following section outlines the reporting expectations and procedures based on the volunteer’s engagement type. These processes reflect our organisational values, support

trauma-informed practice, and reinforce Whiddon's zero-tolerance approach to harm or misconduct involving children.

Whiddon's existing whistleblower and incident reporting policies include explicit inclusion of child safety breaches and escalation procedures for suspected abuse, grooming, or misconduct

Reporting Processes

Whiddon Personnel

- All Whiddon personnel must immediately report any concerns, disclosures, or allegations of child abuse, neglect, grooming, or exploitation.
- Whiddon complies with all mandatory reporting laws in New South Wales and Queensland and will notify relevant authorities such as Police and Child Protection Services as required.
- Reporting mechanisms are confidential, accessible, and designed to include child-friendly options where appropriate (e.g., posters, plain language materials).
- Whistleblower protections apply to any report made in good faith.

Reporting processes vary depending on how the volunteer has joined the organisation:

Directly Recruited Volunteers (e.g., individuals who apply through our Volunteer Program):

- In the first instance, concerns should be raised with the site supervisor or the Volunteer Manager.
- Where the concern involves a child or young person, mandatory reporting obligations apply, and escalation should follow our internal child safety procedures.
- Volunteers must be made aware of their right to report serious misconduct or abuse through our Whistleblower Policy, ensuring confidentiality and protection from retaliation.

School-Based Volunteers (Duke of Edinburgh participants):

- Each student volunteer is supported by a Duke of Edinburgh Leader at their school (typically a teacher or senior staff member). While Duke of Edinburgh does not enforce a formal reporting process, any concerns involving students should be shared with the school's Leader as the primary point of contact.
- Whiddon will maintain direct contact with the school as needed, including through the Assessor (local supervisor) listed in the Volunteer Commencement Guide, and the Volunteer Manager, to ensure mutual accountability and open communication.

7. Breach of Policy

Failure to comply with this policy may result in disciplinary action, including the termination of employment or contractual arrangements.

Breaches involving actual or potential harm to a child or vulnerable person

- Will be reported to the appropriate statutory authorities, including the Police, in accordance with mandatory reporting obligations

Individuals must:

All individuals engaged in child-specific related work must:

- Present a valid Working with Children Check (WWCC) (NSW) or Blue Card (QLD) clearance before commencing any duties involving contact with children³
- Immediately notify Whiddon of any changes to their clearance status, including suspension, cancellation, or expiry
- Ensure their clearance remains current by renewing their WWCC or Blue Card before the expiry date, to avoid any lapse in eligibility for child-related work⁴

8. Intergenerational Program Requirements

Whiddon's intergenerational programs involve children, often from local schools, visiting residential aged care homes or home care services, to participate in activities like reading, craft, and gardening. These programs foster joy, learning, and social connection. To ensure appropriate child protection, the following practices must be followed:

a) Program Structure and Oversight

- The program must operate as an **official school excursion**, ensuring:
- Parental and school consent is obtained
- Schools complete their own risk assessments
- The duty of care remains with school staff (teachers or designated supervisors)

b) Supervision

- Children must be under the direct supervision of school staff at all times.
- At no stage should a child be left alone with a resident client, or Whiddon staff member.

c) Behaviour Standards

- Clear behaviour expectations must be set and agreed upon, including:

³ Working with Children (Risk Management and Screening) Act 2000 (QLD) – s.171 and Child Protection (Working with Children) Act 2012 (NSW)

⁴ ibid

- Physical interaction guidelines (e.g., avoid hugging unless agreed by the school and family)
- Respectful communication
- Mutual understanding of privacy and boundaries

d) Consent and Use of Media

- Written parental consent must be obtained prior to:
- Photographing or filming children during the program
- Using such media in external publications or on social media
- Children's surnames and identifiable location details must never be published.

e) Resident and Client Participation Screening

- All residents and clients invited to participate in intergenerational programs will be assessed for suitability, considering any behavioural or cognitive factors that may pose a risk to children.
- While Whiddon takes all reasonable steps to ensure participants are appropriate for involvement, we cannot guarantee that residents or clients do not have a history of child abuse allegations or charges. To mitigate this risk, Whiddon implements a range of child safety measures outlined in this policy including ensuring that residents and clients are not left alone with children.

f) Alignment with School Policy

- Whiddon must liaise with participating schools to ensure the program aligns with their child protection and safeguarding policies. Additional school-specific requirements must be observed.

9. Recruitment and Screening

Whiddon maintains a robust child-safe recruitment and screening process that complies with both New South Wales and Queensland legislation. All recruitment practices are designed to ensure the suitability of individuals who may have direct or indirect contact with children.

This includes:

- Verification of Working with Children Check (WWCC) for staff in New South Wales engaged in child-related work⁵
- Verification of Blue Card clearance for staff and volunteers in Queensland engaged in child-related work⁶

⁵ Child Protection (Working with Children) Act 2012 (NSW)

⁶ Working with Children (Risk Management and Screening) Act 2000 (QLD)

- Verification of NDIS Worker Screening Check for workers in aged care roles across both states, where applicable⁷
- Behavioural interview questions that assess past conduct and understanding of safeguarding responsibilities
- Mandatory reference checks with a focus on integrity, professional conduct, and prior behaviour around children and vulnerable people
- Ongoing monitoring and renewal tracking of all WWCC, Blue Card, and NDIS Worker Screening Check statuses to ensure continued compliance

10. Media & Consent Policy for Children

Whiddon’s media policies reflect the following child-specific protections:

- Written parental/guardian consent is required for all images or video of children
- Consent specifies how and where the media may be used (e.g., internal vs public use)
- Images must not include:
 - Children’s surnames
 - Residential locations or schools
 - Any other identifying details
- Media must be stored securely and accessed only by authorised personnel

11. Child-Friendly Reporting

Child-Friendly Reporting Mechanisms

- For intergenerational programs, Whiddon will provide age-appropriate materials (e.g., posters or leaflets) that:
 - Encourage children to speak up if they feel unsafe
 - Use simple language and visual symbols
 - Include clear instructions on who to talk to (e.g., their teacher or a named school contact)
- Child safety concerns, complaints, or feedback may also be raised through Whiddon’s **Complaints Management Policy and Procedure**, which provides confidential, trauma-informed pathways for children, families, carers, and community members. Accessible complaint channels (including verbal, written, and anonymous options) are available to ensure children and families linked to CHSP services can safely raise concerns.

⁷ Practice Standards—Worker Screening) Rules 2018

12. Monitoring and Compliance

Whiddon ensures ongoing compliance with safeguarding requirements through robust monitoring, documentation, and review processes. The following measures are in place:

Maintenance of screening registers:

The People and Culture team maintains up-to-date registers of:

- NSW Working with Children Checks (WWCC) (for child specific work)
- QLD Blue Card clearances
- NDIS Worker Screening Checks (NDISWSC)
- National Criminal History Record Check (NCHRC)
- AHPRA registration of relevant professionals
- Responsible Persons suitability checks

These are regularly monitored for validity, renewal, and any suspension or revocation notifications.⁸

Annual program reviews:

All programs involving children, including intergenerational activities, undergo annual safeguarding reviews to assess:

- Risk mitigation strategies
- Compliance with child-safe procedures
- Staff training completion
- Feedback from participants and school partners

Policy breach response:

Any suspected breach of this policy will be subject to prompt investigation. Where substantiated, Whiddon will take appropriate corrective action, which may include disciplinary measures, retraining, or termination of engagement.

Mandatory reporting compliance:

Whiddon ensures all legal obligations related to mandatory reporting are fulfilled in both NSW and QLD. This includes immediate reporting to:

- NSW Department of Communities and Justice (DCJ) or Police
- QLD Department of Child Safety or Police⁹

⁸ *Child Protection (Working with Children) Act 2012 (NSW); Working with Children (Risk Management and Screening) Act 2000 (QLD)*

⁹ *Children and Young Persons (Care and Protection) Act 1998 (NSW); Child Protection Act 1999 (QLD)*

Timely reporting of concerns:

All suspected or alleged incidents of

- abuse,
- neglect,
- grooming,
- or exploitation

will be reported promptly to relevant statutory authorities, in accordance with the law and Whiddon’s safeguarding procedures to relevant authorities, including the Police, as required by law and our safeguarding policies.

Policy Review

1. This Policy will be reviewed annually to ensure it continues to reflect current legal requirements and best practice under the Commonwealth Home Support Programme and the National Child Safe Principles. Input from children, families, staff, volunteers, and community stakeholders will be actively sought to strengthen continuous improvement and cultural safety
2. This policy will be tabled annually with the Executive and Board as part of CHSP contract monitoring and organisational safeguarding reviews.

13. Training and Support

3. Whiddon is committed to providing ongoing training and support to all staff and volunteers to ensure they understand their responsibilities in safeguarding children. This includes:
 1. **Induction Training:** All new employees and volunteers will receive comprehensive induction training on child safety policies and procedures, including the Child Safe Code of Conduct.
 2. **Ongoing Training:** Regular training sessions will be conducted to update employees and volunteers on any changes to child safety legislation, policies, and best practices.
 3. **Specialized Training:** Employees and volunteers in roles that involve direct contact with children will receive specialized training on identifying and responding to child safety concerns.
 4. **Support Mechanisms:** Whiddon will provide access to support services, including counselling and debriefing, for staff and volunteers who may be affected by child safety incidents.
 5. **Performance Reviews:** Regular performance reviews will include an assessment of staff and volunteers' understanding and implementation of child safety practices.

14. Communication and Promotion

4. Whiddon will ensure that the Child Safety Policy is effectively communicated and promoted to all stakeholders, including staff, volunteers, children, families, and the community. This includes:

1. **Policy Accessibility:** The Child Safety Policy will be readily accessible on Whiddon's website and intranet, and hard copies will be available upon request.
2. **Awareness Campaigns:** Regular awareness campaigns will be conducted to promote the importance of child safety and inform stakeholders about the policy and reporting mechanisms.
3. **Staff Meetings:** Child safety will be a standing agenda item in staff meetings to ensure ongoing discussion and reinforcement of child safety practices.
4. **Community Engagement:** Whiddon will engage with the community through events, newsletters, and social media to promote child safety and encourage community involvement in safeguarding children.
5. **Feedback Mechanisms:** Whiddon will provide mechanisms for staff, volunteers, children, and families to provide feedback on the Child Safety Policy and its implementation.

15. Legislative Framework

Relevant Legislation

Commonwealth:

- Privacy Act 1988 (Cth)
- National Disability Insurance Scheme Act 2013 (Cth)
- National Principles for Child Safe Organisations (Australian Human Rights Commission)

New South Wales:

- Children and Young Persons (Care and Protection) Act 1998 (NSW)
- Child Protection (Working with Children) Act 2012 (NSW)
- Child Protection (Offenders Registration) Act 2000 (NSW)

Queensland:

- Child Protection Act 1999 (QLD)
- Working with Children (Risk Management and Screening) Act 2000 (QLD)
- Education (General Provisions) Act 2006 (QLD)
- Whiddon's child-related programs in Queensland will also comply with the legislative requirement to have a Child and Youth Risk Management Strategy under the Working with Children (Risk Management and Screening) Act 2000 (QLD).

Key Compliance Websites

- Office of the Children's Guardian (NSW): <https://ocg.nsw.gov.au>
- Blue Card Services (QLD): <https://www.qld.gov.au/blue-card-services>

- Australian Human Rights Commission (National Principles): <https://childsafe.humanrights.gov.au>
- NDIS Quality and Safeguards Commission: <https://www.ndiscommission.gov.au>
- Australian Government Privacy: <https://www.oaic.gov.au>
- Department of Communities, Child Safety and Disability Services (QLD): <https://www.qld.gov.au/community/getting-support-health-social-issue/support-victims-abuse/child-abuse>
- Department of Communities and Justice (NSW): <https://dcj.nsw.gov.au/>

Appendix A Child Safe Code of Conduct¹⁰

Purpose

This Code of Conduct outlines the minimum standards of behaviour required from all Whiddon employees, volunteers, contractors, and partners to ensure a safe, respectful, and protective environment for children and vulnerable people.

Scope

This Code applies to all personnel engaged by Whiddon involved in any activities or roles where they may have direct or indirect contact with children.

Principles

- **Respect:** Treat all children with dignity, respect, and fairness.
- **Safety:** Prioritise the physical, emotional, and psychological safety of children at all times.
- **Integrity:** Act honestly and transparently in all interactions involving children.
- **Confidentiality:** Respect the privacy of children and families; only share information on a need-to-know basis.
- **Accountability:** Take responsibility for your actions and report any concerns promptly.
- **Appropriateness:** Never speak to, or act toward, a child in a way that is sexual in nature, suggestive, or could reasonably be perceived as inappropriate.

Required Behaviours

- 1) **Maintain Appropriate Boundaries**
 - a) Do not engage in behaviour that is, or could be perceived as, inappropriate, abusive, or exploitative.
 - b) Avoid physical contact with children unless it is necessary, appropriate, and with the child's consent (e.g., comforting a distressed child, stopping them from falling).
 - c) Do not develop personal relationships with children that extend beyond professional responsibilities.
 - d) Do not use language or physical actions that are sexually suggestive or could be interpreted as having sexual connotations
 - e) Do not initiate or maintain online contact with a child outside of authorised Whiddon communication channels.
- 2) **Communication**
 - a) Use respectful, age-appropriate language.

¹⁰ Based on information from the Office of the Children's Guardian NSW

- b) Do not use language that is discriminatory, humiliating, or offensive.
 - c) Do not use language that are sexually suggestive or could be interpreted as having sexual connotations
 - d) Avoid private one-on-one contact with children outside of program settings.
- 3) Supervision and Safety
- a) Ensure children are supervised at all times by appropriate personnel, especially during programs like intergenerational visits.
 - b) Never leave a child unattended or in the sole care of an individual who is not authorised.
 - c) Follow all safety protocols and guidelines during interactions with children.
- 4) Social Media and Contact
- a) Do not initiate or accept friend requests or private messaging with children on social media platforms.
 - b) All contact with children should be professional and through approved channels.
- 5) Use of Images and Information
- a) Obtain written parental/guardian consent before photographing or recording children.
 - b) Never share images or personal information about children without explicit permission.
 - c) Avoid using children's full names or identifiable details in any public forum.
- 6) Reporting Obligations
- a) Immediately report any suspicions, disclosures, or observations of abuse, neglect, or inappropriate behaviour towards children to the designated safeguarding officer.
 - b) Cooperate fully with any investigations related to child safety concerns.

Prohibited Behaviours

- 1) Any form of physical, emotional, or sexual abuse or neglect of a child.
- 2) Engaging in or promoting discriminatory or harmful practices.
- 3) Using language or behaviour that intimidates, humiliates, or belittles children.
- 4) Using language or physical actions that are sexually suggestive or could be interpreted as having sexual connotations
- 5) Sharing confidential information or images without permission.
- 6) Failing to report suspected or actual child safety concerns
- 7) Use drugs or alcohol around children or encourage them to use drugs or alcohol.
- 8) Babysit, mentor or tutor a child out of work hours .

Appendix B Child Safe Statement of Commitment

At Whiddon, the safety and wellbeing of all people in our care is our highest priority. This includes children who may come into contact with our services through intergenerational programs, home care visits, family connections, volunteers, or community engagement.

We are committed to ensuring that children and young people feel safe from abuse and neglect. The safety, rights, and voices of children will always be respected and protected in our aged care, Home Care, and CHSP service environments.

Our Commitment

- We uphold every child's right to feel safe, be heard, and be protected from harm.
- We create environments that are inclusive and culturally safe, particularly for Aboriginal and Torres Strait Islander children, children with disability, and children from culturally and linguistically diverse backgrounds.
- We apply rigorous screening, recruitment, and training practices to all staff, volunteers, students, and contractors, consistent with aged care, NDIS, and child protection requirements.
- We maintain a clear Child Safe Code of Conduct, setting out expectations for safe behaviour and professional boundaries.
- We provide safe ways for children, families, and communities to raise concerns or complaints, and we respond to all reports quickly and transparently.
- We work in partnership with families, carers, and communities to strengthen awareness and shared responsibility for child safety.
- We integrate child safety into our governance, risk management, and incident reporting systems, including reporting obligations under the Serious Incident Response Scheme (SIRS) and state child protection laws.

Everyone has a role in keeping children safe. At Whiddon, we are committed to building a culture of safety, trust, and accountability in every part of our aged care, Home Care, and CHSP services.

This statement reflects our compliance with the **Aged Care Act 2024**, the **Aged Care Quality Standards**, CHSP grant requirements, the **National Principles for Child Safe Organisations**, and relevant state and territory child safeguarding laws.

Appendix C Whiddon Safeguarding Children Policy Alignment with requirements

Whiddon Safeguarding Children Policy ↔ National Child Safe Principles ↔ CHSP Obligations

National Principle	Whiddon Policy Sections	CHSP Compliance Link
1. Child safety is embedded in organisational leadership, governance, and culture.	Policy Statement; Responsibilities; Board and Executive Management	Meets CHSP requirement for governance systems that protect consumers, families, and children in service settings.
2. Children and young people are informed about their rights, participate in decisions affecting them, and are taken seriously.	Child-Friendly Reporting; Intergenerational Program Requirements	Ensures children in CHSP contexts (visiting households, programs, intergenerational activities) know how to speak up.
3. Families and communities are informed and involved in promoting child safety.	Intergenerational Program Requirements; Media & Consent Policy; Complaints & Feedback Integration	Supports CHSP requirement to engage families and carers in safe service delivery.
4. Equity is upheld and diverse needs respected in policy and practice.	Policy Statement; Code of Conduct; Behaviour Standards (Appendix)	Ensures culturally safe and inclusive CHSP services where children are present.
5. People working with children are suitable and supported.	Screening Requirements; Recruitment and Screening; Compliance Requirement Summary	CHSP requires screening, reference checks, and workforce suitability measures.
6. Processes to respond to complaints and concerns are child focused.	Reporting & Mandatory Notifications; Child-Friendly Reporting; Complaints Integration	Meets CHSP complaint handling requirements; provides trauma-informed and child-accessible channels.
7. Staff and volunteers are equipped with knowledge,	Training and Support; Induction Training; Ongoing Training	CHSP workforce obligations include

National Principle	Whiddon Policy Sections	CHSP Compliance Link
skills, and awareness to keep children safe.		safeguarding awareness and training.
8. Physical and online environments are safe for children.	Child Protection Measures; Behaviour Standards; Social Media & Contact rules (Appendix)	Protects children during CHSP in-home visits, community transport, and intergenerational programs.
9. Implementation of child safety is regularly reviewed and improved.	Risk Assessment and Compliance Monitoring; Policy Review (incl. annual CHSP review)	Demonstrates CHSP continuous improvement requirement in service delivery and governance.
10. Policies and procedures document how the organisation is safe for children.	Whole Policy; Legislative Framework; Compliance Requirement Summary	Meets CHSP requirement for written safeguarding policy as part of quality system.
11. Organisations that engage in activities with Aboriginal and Torres Strait Islander children and young people demonstrate respect and cultural safety.	Policy Statement (commitment to human rights, respect, inclusion); Code of Conduct	Aligns with CHSP obligations to deliver culturally appropriate services, recognising intergenerational households.

Compliance Requirement Summary

Policy Area	Whiddon Policy Sections	Relevant Law / Standard	Jurisdiction	Compliance Notes
Worker Screening & Suitability	Sections 3 (Screening Requirements), 9 (Risk Assessment & Compliance Monitoring), 11 (Recruitment & Screening), Appendix (Code of Conduct)	- NSW: Child Protection (Working with Children) Act 2012 (Working With Children Check) - QLD: Working with Children (Risk Management and Screening) Act 2000 (Blue Card requirements) - Commonwealth: NDIS (Practice Standards – Worker Screening) Rules 2018 (for NDIS-funded aged care roles)	NSW, QLD, Commonwealth	Confirms all staff/volunteers in child-specific related work must hold valid WWCC/Blue Card. Policy includes suitability checks and compliance mapping to NDIS worker screening.
Child Protection Measures	Sections 4 (Child Protection Measures), 10 (Policies & Procedures), Appendix (Behaviour Standards)	- NSW: Children and Young Persons (Care and Protection) Act 1998 - QLD: Child Protection Act 1999	NSW, QLD	Outlines obligations to identify, respond to, and report risks of harm to children in CHSP-funded activities, including in-home and

				community settings.
Mandatory Reporting	Sections 5 (Reporting & Mandatory Notifications), 14 (Reporting Procedures)	- NSW: Children and Young Persons (Care and Protection) Act 1998, s.27 (Mandatory reporting by designated persons) - QLD: Child Protection Act 1999, s.13E (Mandatory reporting by early childhood education and care professionals)	NSW, QLD	Clarifies mandatory reporting duties for relevant staff. Aligns with CHSP expectations that providers comply with state-based child protection laws.
Intergenerational Program Requirements	Section 10 (Intergenerational Program Requirements)	- NSW: Department of Education Excursion Policies - QLD: Education (General Provisions) Act 2006 (duty of care obligations)	NSW, QLD	Requires Whiddon to ensure collaboration with schools and compliance with education sector child protection obligations during CHSP-funded intergenerational activities.
Media & Consent	Section 12 (Media & Consent	- Commonwealth: Privacy	National, NSW, QLD	CHSP requires informed consent from

	Policy); Appendix (Consent requirements)	Act 1988 (Cth) - NSW Privacy and Personal Information Protection Act 1998 - QLD Information Privacy Act 2009		clients and families; policy explicitly includes image use, privacy, and confidentialit y obligations.
Risk Assessment & Safe Environments	Section 6 (Risk Assessment & Compliance Monitoring); Section 13 (Risk Mitigation); Child Protection Measures; Appendix	- WHS Act 2011 (NSW/QLD) - Education (General Provisions) Act 2006 (QLD)	NSW, QLD, Commonwe alth	Risk assessments mandated for child-related environments and CHSP service delivery, including home visits and excursions. Policy meets and documents these practices.
Training & Support for Staff & Volunteers	Sections: Training and Support; Induction Training; Ongoing Training	- National Principles (Principle 7) - CHSP Manual – workforce training obligations	National, NSW, QLD	Ensures staff/volunte ers in CHSP roles are equipped with child- safety knowledge, ongoing training, and support.
Cultural Safety & Inclusion	Policy Statement; Behaviour Standards (Appendix); Intergeneratio	- CHSP Program Manual (inclusive and culturally safe service	National	Policy commits to respecting cultural diversity, particularly for Aboriginal

	nal Program Requirements	delivery) - National Principles (Principle 4 & 11)		and Torres Strait Islander children and culturally diverse families in CHSP services.
Monitoring & Continuous Improvement	Section 9 (Risk Assessment & Compliance Monitoring); Policy Review	- National Principles (Principle 9) - CHSP Grant Agreement (continuous quality improvement obligations)	National	Policy includes review cycle and compliance mapping, ensuring systematic evaluation and alignment with CHSP quality framework.



Whiddon