

Child Safeguarding Policy

Effective Date: November 2025

This policy applies to:

All persons who conduct work for Guide Dogs Victoria (GDV) in a paid or unpaid capacity, regardless of whether that person's role relates to children, including employees, volunteers, contract and subcontract workers, agency on-hire staff, consultants, and students.

1. General

Guide Dogs Victoria (GDV) is committed to the safety and wellbeing of children and young people. We aim to foster a culturally safe, child safe and child friendly environment for all children and young people we have contact with, deliver services to, or are impacted by our work. We seek to prevent harm of any kind impacting children and young people and have zero tolerance for child abuse, racism and inequality. We recognise the individual needs of children with disability and their additional vulnerability to risks. Children and young people's rights, relationships, identity, and culture must be recognised and respected, their voices heard, and their concerns acted upon.

2. Purpose

The purpose of this policy is to demonstrate the strong commitment of GDV to the care, safety and wellbeing of all children at GDV. It provides a clear statement of 'no tolerance' and ensures that all parties are aware of their responsibilities to prevent and report child abuse and harm.

The Policy covers the following topics:

- GDV child safety and wellbeing arrangement expectations
- Reporting child safety incidents and managing child safe concerns and complaints
- Information sharing expectations
- Record keeping expectations
- Further guidance on how GDV can demonstrate child safety and wellbeing
- Non-compliance with this Policy.
- Roles and responsibilities

This Policy should be read in conjunction with:

- Child Safeguarding Strategy
- Code of Conduct Policy
- Child Safe Code of Conduct
- Child Safety Procedure
- Child safe booklet
- Childsafe booklet for Aboriginal and/or Torres Strait Islander children

3. Definitions

Aboriginal refers to Aboriginal and/or Torres Strait Islander people.

Adult is any person 18 years or over.

Child(ren) includes both children and young people under the age of 18 years.

Child abuse is defined in the *Child Wellbeing and Safety Act*, and includes:

- a sexual offence committed against a child
- an offence committed against a child under section 49M(1) of the Crimes Act, such as grooming
- inflicting physical violence on a child
- inflicting serious emotional or psychological harm on a child

- serious neglect of a child.

A child safe complaint can include an expression of dissatisfaction about:

- GDV's services or dealings with individuals
- allegations of abuse or misconduct by a staff member, a volunteer, or another individual
- disclosures of abuse or harm made by a child
- the conduct of a child at the organisation
- the inadequate handling of a concern
- general concerns about the safety of a group of children or activity.

A child safe concern can include any potential issue that could impact negatively on the safety and wellbeing of children.

Child Safe Standards as made under section 17(1) of the Child Wellbeing and Safety Act.

Reportable conduct is defined in the Child Wellbeing and Safety Act as:

- a sexual offence committed against, with or in the presence of, a child, whether or not a criminal proceeding in relation to the offence has been commenced or concluded
- sexual misconduct, committed against, with or in the presence of, a child
- physical violence committed against, with or in the presence of, a child
- any behaviour that causes significant emotional or psychological harm to a child or
- significant neglect of a child.

Worker(s) means a person who conducts work for GDV in a paid or unpaid capacity, regardless of whether that person's role relates to children, including an employee, volunteer, contract and subcontract worker, agency on-hire staff, consultant, student.

4. Child safety and wellbeing arrangement expectations

GDV is a child safe organisation and supports child safety and wellbeing

All children have the right to be safe from harm and abuse when interacting with GDV. GDV has risk management strategies in place to identify, assess and take steps to minimise harm to children and other people's health, safety and wellbeing. This includes developing, delivering and reviewing policies, processes, protocols, services and arrangements, and taking appropriate action to address unsafe practices in line with GDV policies.

A child safe culture is championed and modelled at all levels of GDV, which is facilitated by strong leadership and governance arrangements.

GDV has guidelines for Workers on expected behavioural standards and responsibilities. These include a:

- Child Safeguarding Strategy
- Statement of Commitment to Child Safety and Wellbeing
- Child Safeguarding Policy
- Code of Conduct Policy
- Child Safe Code of Conduct
- Child Safety Procedure

Child safe arrangements are subject to regular review to ensure GDV continues to improve its practices and meet the needs of children.

GDV will also implement this Policy by:

- requiring all departments to identify and action any child safety risks tailored to their specific circumstances and needs of children they interact with, or that their function impacts.
- managing child safety incidents and child safe concerns and complaints
- providing training on child safety and wellbeing
- analysing child safety incidents and child safe concerns and complaints to identify causes and systemic failures to inform continuous improvement
- reporting to the Board on risks to children, GDV's implementation and compliance with Child Safe Standards and performance in delivering child safety and wellbeing.

A Culturally Safe Environment

All instances of racism towards children must be reported to the GDV's Child Safety Officer for consideration and management.

Children accessing GDV services should be able to identify their culture. GDV encourages and supports children in expressing and enjoying their cultural rights.

GDV respects and values Aboriginal and Torres Strait Islander (Aboriginal) children, appreciates the strengths of Aboriginal culture and understands the importance of culture and community to the wellbeing and safety of Aboriginal children.

GDV will also demonstrate its support of Aboriginal children and those from a multicultural, multifaith and culturally and linguistically diverse background through:

- culturally safe and accessible service delivery
- providing staff with access to broad cultural awareness, diversity, equity and inclusion training
- development and implementation of a Diversity, Equity and Inclusion Strategy
- Providing a childsafe booklet for Aboriginal and/or Torres Strait Islander children

Promoting child empowerment and participation and involving families and communities

GDV recognises that children are more likely to raise concerns when they feel confident, valued, empowered, and listened to.

GDV will consider, support and facilitate the empowerment, participation and inclusion of the voices, opinions and rights of all children when developing, delivering and reviewing their policies, processes, protocols, services and arrangements. GDV encourages staff to engage with children to help them understand their rights and GDV's arrangements to keep them safe.

GDV recognises that families can play an important role in keeping children safe. GDV will keep families informed of its child safety arrangements, provide access to relevant support, and identify opportunities to inform, consult and/or involve families on matters affecting their child.

GDV encourages respectful relationships between children with adults and with their peers that are built on trust and respect and maintain appropriate boundaries.

GDV will demonstrate its support for informing, consulting and/or involving children, their families and communities, in the organisation through:

- Consumer Advisory Council
- Workshopping camp activities with attendees
- Tailoring written communication to target a Child audience
- Featuring information on GDV child safety and wellbeing arrangements on GDV's publicly available website including material designed specifically for children.

Equity is upheld and diverse needs are respected in policy and practice

GDV supports equity and inclusion and recognises that some children may be more vulnerable to abuse than others. GDV actively supports and responds to children with diverse circumstances. Children or families on their behalf accessing GDV services and activities should be able to self-identify their diverse needs. This includes GDV processes having consideration of culture, disability, ethnicity, gender, geographic location, language, opinion, race, relationship, religion, sex characteristics, sexuality, socioeconomic status, upbringing, visa status or other situation that makes children feel vulnerable.

GDV will provide children and their families with access to information and supports related to its child safety arrangements, including the process to handle all child safety incidents and child safe concerns or complaints. This must be in ways that are culturally safe, accessible, and easy to understand such as in a range of formats and is complimented by direct engagement and with support from staff.

GDV will also demonstrate its support and respond to children with diverse circumstances through a Diversity, Equity and Inclusion Strategy.

Recruitment of people working with Children

GDV's recruitment and selection processes uphold GDV's commitment to be a child safe organisation. GDV has a range of tools, including mandatory recruitment screening processes, to assess and hire suitable individuals to work with children.

The recruitment of positions that involve contact with children will use advertising and selection criteria to employ the most appropriate staff. Selection policies and guidelines, including pre-safety screening activities, reflect an understanding of, and commitment to, a safe environment for children.

GDV will also demonstrate its support for the recruitment of suitable staff to work with children through:

- job advertisement and position description templates that include a statement that demonstrates GDV's commitment to child safety and wellbeing
- a Recruitment Policy
- an Onboarding Policy
- a Mandatory Safety Screening Policy

Workers are suitable and supported

GDV will offer child safety and wellbeing training to all Workers so that they are aware of their obligations under this Policy and other relevant child safe policies.

Higher-risk areas where Workers are likely to come into regular contact with children must have additional training opportunities. This training includes how to recognise child abuse and harm caused by adults or children, how to respond effectively to issues of child safety and how to support colleagues who make disclosures.

Workers are supervised and managed to develop knowledge and skills, raise concerns and discuss child safety issues.

GDV will also demonstrate its support for training staff to work with children through:

- performance and development planning sessions and on-the-job supervision, feedback, support, and advice opportunities

- intranet access to this Policy, the Child Safe Code of Conduct and the Code of Conduct Policy
- training to introduce employees to the Child Safe Standards and the Reportable Conduct Scheme

Safe physical and online environments

GDV will take measures to reduce the risk of harm to children in both physical and online environments. GDV must prioritise the safety of children and balance mitigating risks in the physical and online environments without compromising a child's right to privacy, access to information, social connections and learning opportunities.

GDV will demonstrate its support for minimising the opportunity for children to be harmed in the physical and online environment through:

- a Supplier and Purchasing Management Policy and procurement resources that help protect children from risks of child abuse and harm by third-party contractors
- information management and security policies and resources, including the Use of Technology, Media Consent and Social Media policies
- occupational health and safety arrangements
- requiring oversight of children in physical environments and their use of online environments tailored to their specific circumstances and risks
- driving positive outcomes for the community, including children, through responsive, reliable, and efficient risk management efforts and improvements across the organisation.

5. Reporting child safety incidents and managing child safe concerns and complaints

GDV works to ensure all children, their families and Workers understand their obligations and know who to tell if they observe harm and abuse, are a victim, or if they notice inappropriate behaviour.

When operationally faced with a child safety incident or child safe concern or complaint, GDV prioritises Workers immediately acting in the best interests of the Child to make them safe before promptly reporting the matter internally through the incident management process or directly to GDV's Child Safety Officer.

Any person can make a report directly to GDV's Child Safety Officer. GDV's Child Safety Officer is available to assist with any child safety matter.

GDV will take all reports seriously and act promptly to address them in accordance with GDV policies, processes, and the law.

Where required, GDV will report the matter to external authorities such as Victoria Police, the Commission for Children and Young People. Refer to the Workplace Incident Management and Reporting Procedure for further information.

GDV will use child safety incidents and child safe concerns and complaints as a valuable source of information to help improve the organisation.

All employee behaviour must be reported to GDV's Child Safety Officer if it may:

- constitute reportable conduct or breach GDV's Code of Conduct Policy
- breach this Policy
- not comply with GDV Child Safe Code of Conduct Policy.

GDV's Child Safety Officer is the Chief Executive Officer (CEO), who can be contacted by phone on 0408 562 323 or by email at NickyL@guidedogsvictoria.com.au. The CEO will delegate Child Safety Officer responsibilities during periods of absence.

GDV will take appropriate action to resolve or progress any report including referring relevant matters:

- to external authorities such as Victoria Police and the Commission for Children and Young People
- internally through the incident management process for appropriate resolution.

“Failure to protect”, “failure to disclose” and any other criminal or suspected criminal behaviour

All criminal and suspected criminal behaviour and offences must be reported to Victoria Police. This includes the following criminal offences under the Crimes Act 1958:

- Failure by a person in authority to protect a child from a sexual offence
- Failure to disclose a sexual offence committed against a child under the age of 16 years.

GDV must notify Victoria Police of any criminal or suspected criminal behaviour when it becomes aware of the matter and if it has not already been reported.

Physical or sexual abuse, including grooming, of children is a crime.

Reportable conduct

Reportable conduct allegations about a GDV staff member must be reported to GDV’s Child Safety Officer and can also be directly reported to the Commission for Children and Young People on 1300 78 29 78, contact@ccyp.vic.gov.au or their Reportable Conduct Scheme secure webform located on their website (ccyp.vic.gov.au).

Allegations of reportable conduct about a non-staff member should be reported to the Commission for Children and Young People, non-staff member’s organisation or GDV’s Child Safety Officer.

GDV must notify the Commission for Children and Young People within three business days of becoming aware of a reportable allegation and provide them with updates on its response to an allegation within 30 calendar days.

Notification to the Commission for Children and Young People about an allegation is not required if it is plainly wrong or has no basis.

The Reportable Conduct Scheme does not replace the need to report allegations of child abuse, including criminal conduct and family violence, to Victoria Police.

Further information about how GDV and its staff will meet its obligations under the Reportable Conduct Scheme is available in GDV's Code of Conduct Policy and Workplace Incident Management and Reporting Procedure.

Note: There is no dedicated reportable conduct scheme in South Australia, Northern Territory or Queensland, however there are mandatory reporting obligations for NDIS providers in these States, where child abuse is suspected. Refer Workplace Incident Management and Reporting Procedure for further information.

Mandatory and general reporting to Child Protection of a belief that a Child has suffered or is likely to suffer significant harm as a result of abuse or neglect and their parent has not or is unlikely to protect them from harm of that type.

Any person can make a report to Child Protection at any time.

When notified, GDV will discuss the matter with the relevant person(s) involved, including the approach to manage the matter.

Further information about making a complaint to Child Protection is available at the Department of Families, Fairness and Housing website for [reporting child abuse](#).

Other child safe concerns and complaints

General concerns or complaints relating to child safety and wellbeing, should be notified to GDV's Child Safety Officer.

GDV's Child Safety Officer will:

- acknowledge a child safe concern or complaint
- take appropriate action to resolve or progress the resolution of the child safe concern or complaint. Where required, the matter will be referred to the relevant GDV department to address.

- if appropriate, ensure the person who reported the child safe concern or complaint is advised of the outcome, including any GDV external reporting requirements.

6. Information sharing expectations

Confidentiality is important to support an effective complaint and investigation process.

Restricting information sharing to only those who need to know, ensures the safety of those involved in the process.

Sometimes it will not be possible to maintain confidentiality to best protect children or so that the subject of an investigation can be treated fairly. There may be instances that for GDV to perform its functions under the Child Safe Standards and Reportable Conduct Scheme, it will be required to collect personal information about the Worker and children and disclose that information to a third party such as the Commission for children and Young People.

Sharing findings, decisions, and outcomes of investigations to relevant parties may also be required to promote the safety and wellbeing of children and in the interest of justice.

GDV will manage information that is collected and/or disclosed, including about an individual, in accordance with the Child Wellbeing and Safety Act, children, Youth and Families Act 2005, Fair Work Act 2009, Privacy and Data Protection Act 2014, and GDV's privacy and information security policies and procedures.

7. Record keeping expectations

GDV will keep full, timely and accurate records of all child safety incidents and child safe concern and complaint matters including outcomes of an investigation using relevant incident reporting systems. Records should have a full account of how the issue arose, what response was taken and what happened. Records should be sufficiently detailed, dated, objective and comprehensive to make decisions transparent and capable of effective review or form good evidence if needed. Documents should record the stages and steps taken in the process, the evidence considered and the outcome of any investigation or relevant decisions or resolutions made, including any findings made, reasons for decisions and actions taken.

Incidents will be recorded in the incident reporting system. Access to records should be to people on a restricted need-to-know basis. Records are not to be destroyed or removed from files unless, or until provided for, as part of proper retention and disposal processes.

GDV will use the records and useful statistical data of all child safety matters as a valuable source of information to facilitate the identification of trends. These trends will help inform ongoing child safety and wellbeing risk management strategies to prevent, identify and mitigate risks to children and help improve GDV child safety and wellbeing arrangements

8. Responsibilities

Child safety is everyone's responsibility.

The **Board** are responsible for:

- Ensuring they are aware of the legal obligations relating to the reporting of child abuse.

The **Chief Executive Officer** is responsible for:

- Ensuring that appropriate reporting of child abuse is undertaken in line with legislative requirements and with the requirements for the Commission for Children and Young People.
- Acting as GDV's Child Safety Officer and delegating Child Safety Officer responsibilities during periods of absence

The **General Manager Guide Dog and Vision Services** is responsible for:

- Ensuring that reporting is undertaken for all reported cases of child abuse and that the appropriate action is undertaken in line with the reportable conduct scheme.

Managers and Team Leaders are responsible for:

- Ensuring that the relevant team members are provided with information relating to the Child Safety and Wellbeing Policy.
- Monitoring adherence to the Child Safety and Wellbeing Policy

Employees and Volunteers are responsible for:

- Adhering to the Child Safety and Wellbeing Policy

9. Related Documents

Relevant legislation, standards and policies

Charter of Human Rights and Responsibilities Act 2006

Child Wellbeing and Safety Act 2005

Children, Youth and Families Act 2005

Crimes Act 1958

Fair Work Act 2009 (Cth)
Health Records Act 2001
Occupational Health and Safety Act 2004
Online Safety Act 2021
Privacy and Data Protection Act 2014
Public Records Act 1973
Relevant state child protection legislation (SA, NT, Qld)
Worker Screening Act 2020
Child Safe Standards Victoria
National Principles for Child Safe Organisations
United Nations Convention on the Rights of the Child

Related GDV policies and documents

Child Safeguarding Strategy.
Childsafe booklet
Childsafe booklet for Aboriginal and/or Torres Strait Islander children
Child Safe Code of Conduct
Child Safety Procedure
Code of Conduct Policy
Data Control Policy
Diversity, Equity and Inclusion Strategy
Mandatory Safety Screening Policy
Media Consent Policy
Onboarding Policy
Privacy Policy
Supplier and Purchasing Management Policy
Document Retention and Archiving Policy
Recruitment and Selection Policy
Risk Management Policy
Social Media Policy

10.Change History

<u>Version number</u>	<u>Date</u>	<u>Author</u>	<u>Summary of change</u>
7.2	November 2025	Quality Manager	Incorporate changes from Quality & Clinical Governance Committee Chair
7.1	July 2025	Quality Manager	Incorporate changes from Board Committee
7.0	December 2024	Quality Manager	Major revision incorporating mandatory reporting requirements from Commission for Children & Young People and Victorian Child Safe Standards.
The Charter is due for review by October 2028.			