

CHILD SAFETY POLICY

V6.0

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POLICY STATEMENT

The Sovereign Hill Museums Association (SHMA) is committed to ensuring the safety and wellbeing of all children and young people who visit our sites, participate in our programming, and who work or volunteer with at SHMA. This policy and associated procedures set clear expectations and processes which effect to the Victorian *11 Child Safe Standards*.

Compliance with this policy is a critical part of ensuring children and young people feel safe, respected, heard, valued and protected from harm.

POLICY PRINCIPLES

Scope

1. This policy and all associated procedures and guidelines have been designed to comply with SHMA's legislated and regulatory responsibilities, including the *11 Child Safe Standards* published by the Victorian Commission for Children and Young People.
2. This policy and associated procedures and guidelines apply to all sites (including SHMA services delivered online and SHMA operated social media accounts) where interactions between SHMA workers and children may occur. This specifically includes, but is not limited to:
 - a. Educational offerings to schools, including those delivered offsite as part of school outreach programs;
 - b. School residential camp programs incorporating overnight accommodation at the Sovereign Hill Hotel;
 - c. Engagement of workers (staff and volunteers) aged under 18 years; and
 - d. Online Interactions with children and young people undertaken by SHMA workers as part of their duties.
3. This policy and associated procedures and guidelines apply to all workers and any worker of any third-party contracted by SHMA.
4. A list of the forms of abuse referenced in this policy and associated procedures and guidelines is included in Schedule A.

SHMA's Organisational Commitment to Child Safety

5. SHMA has zero tolerance for child abuse, neglect and all forms of harm to children and young people.
6. All SHMA strategic planning and governance instruments are designed to conform to the *11 Child Safe Standards* published by the Victorian Commission for Children and Young People.
7. An overview of the mechanisms by which SHMA complies with the *11 Child Safe Standards* is included in Schedule B.

Child Safety Code of Conduct

8. The Chief People Officer (CPO) is responsible for implementing and communicating the Child Safety Code of Conduct, a clear statement of responsibilities and expectations for workers' interactions with children and young people.
9. All SHMA workers must read, understand and agree to the Child Safety Code of Conduct as part of the recruitment process and prior to undertaking their first shift. This includes workers who are themselves aged under 18 years (or their guardians as appropriate).
10. All workers and third-party contractors (excluding those aged under 18 years) must provide evidence of a valid Victorian Working With Children's Check prior to undertaking their first shift.

Responding and Reporting

11. SHMA workers are required to report any breaches of this policy and associated procedures and guidelines.
12. The CPO is responsible for implementing and communicating processes for reporting breaches of this policy and associated procedures and guidelines. This includes any requirements for mandatory reporting to law enforcement or other agencies.
13. Investigations of reported breaches will otherwise be conducted in line with the requirements of the Workplace Conduct and Integrity Policy and associated Discipline Procedure.
14. Any breach of this policy and associated procedures and guidelines and/or a failure to report an actual or suspected breach may be considered serious misconduct and result in termination of employment and/or revocation of volunteer status.
15. To ensure the immediate safety of workers and visitors when responding to a report, SHMA may take temporary preventative action including:
 - a. Adjustments to duties, working arrangements, or expectations;
 - b. Suspension from work or volunteering roles;
 - c. Exclusion from SHMA sites; or
 - d. Withdrawal of access to SHMA information technology services.

Children in the Workplace

16. In the interest of balancing work responsibilities with family and other commitments, a worker's line manager may approve a worker's child to be present in the workplace under limited and clearly defined conditions.

LEGISLATION AND STANDARDS

- Child Wellbeing and Safety Act 2005 (Vic)
- Children, Youth and Families Act 2005 (Vic)
- Crimes Act 1958 (Vic)
- Family Law Act 1975
- United Nations Convention of the Rights of the Child
- Worker Screening Act 2020 (Vic)

- Wrongs Act 1958 (Vic)

ASSOCIATED INSTRUMENTS

- Child Safety Code of Conduct
- Child Safety Reporting and Responding Procedure
- Children in the Workplace Procedure
- Working With Children Checks Procedure

ACCOUNTABILITIES

The CPO is accountable for the implementation of this policy, including its communication to SHMA staff and the approval and review of any associated procedures or guidelines.

DEFINITIONS

Aboriginal and Torres Strait Islander	A person who is of Aboriginal or Torres Strait descent, identifies as Aboriginal or Torres Strait Islander and is accepted as Aboriginal or Torres Strait Islander by an Aboriginal or Torres Strait Islander community.
Child	Any person under the age of 18 years (typically 0-12 years).
Child Safe	An environment where children and young people's safety and wellbeing is at the centre of thought, values and actions and where there is an emphasis on genuine engagement with and valuing of children and young people. An organisation must create conditions that reduce the likelihood of harm to children and young people, increase the likelihood of identifying any harm and responds to any concerns, disclosures, allegations or suspicions of harm.
Child Friendly	Behaviour, conduct, practice, process, attitude, environment or treatment that is humane, considerate and in the best interest of child.
Code of Conduct	A document which specifies the behaviours expected of all workers of an organisation.
Cultural safety	The positive recognition and celebration of cultures. It is more than just the absence of racism or discrimination, and more than cultural awareness and cultural sensitivity. It is an environment which is socially and emotionally safe, as well as physically safe for children. It is about shared respect, shared meaning, shared knowledge and experience, of learning, living and working together with dignity and truly listening.
Disability	Any physical, sensory, neurological disability, acquired brain injury or intellectual disability or developmental delay that affects a child's ability to undertake everyday activities.

Disclosure	A child or young person telling someone (through words, drawings or actions) that they feel unsafe or have been harmed.
Harm	Damage to the health, safety or wellbeing of a child/young person, as a result of abuse by adults or the conduct of other children/young people. It includes physical, emotional, sexual and psychological harm.
Information Technology Services	Both the hardware (including computers, telephones, CCTV etc) and software (all licensed, owned, and internally developed systems) used to support operational processes, access to data, monitoring of business performance and security, and communication to and with external stakeholders.
Worker	Any SHMA employee (in any category of employment) or volunteer, including members of the SHMA Board.
Young Person	Any person under the age of 18 years (typically 13-17 years).

SCHEDULE A: Forms of Abuse

Cultural Abuse

Cultural abuse can cause emotional and psychological harm. Cultural abuse occurs when the culture of a people is ignored, denigrated or intentionally attacked. It can be overt or covert, for example, a lack of cultural sensitivity or absence of positive images about another culture. Cultural abuse is especially harmful for children 'because it strikes their sense of identity, self-esteem and connectedness to family and community'.

Emotional or psychological abuse

Emotional and psychological abuse may arise in circumstances that involve persistent verbal abuse, coercive or manipulative behaviour, hostility towards a child, humiliation, belittling or scapegoating, conveying to a child that they are worthless, unloved, inadequate or rejected, or causing a child to frequently feel frightened or in danger.

Exposure to Family Violence

Exposure to violent, threatening or other behaviour by a person that coerces or controls a member of the person's family (the family member), or causes the family member to be fearful. A child is exposed to violence if that child sees or hears family violence or otherwise experiences the effects of family violence.

Grooming

Grooming behaviour can involve the use of a variety of manipulative and controlling techniques used to build trust or normalise sexually harmful behaviour. Grooming is often described as the 'preparation' phase of child sexual abuse, undertaken by the perpetrator to gain the trust of a child, and to establish secrecy and silence. Perpetrators may groom to gain access to a child, initiate and maintain sexual abuse of that child, and to conceal the sexual abuse from others who may identify it.

Harmful Sexual Behaviour

Harmful sexual behaviour is developmentally inappropriate sexual behaviour which is displayed by children and young people and which may be harmful or abusive. It can be displayed towards younger children, peers, older children or adults. It is harmful to the children and young people who display it, as well as those it is directed towards.

Neglect

Neglect is a failure to meet the basic needs of a child (such as their wellbeing and safety). Neglect can arise as a result of a single event or a combination of different events. Some neglectful behaviours that can occur in organisations include:

- supervisory neglect (failure to appropriately exercise adequate supervision or control of a child);
- physical neglect (failure to meet a child's physical needs including the provision of adequate and appropriate food, clothing, shelter or physical hygiene);
- educational neglect (failure to ensure that a child's formal educational needs are being met); and

- emotional neglect (failure to provide adequate nurturing, encouragement and support to a child).

Physical abuse

Physical violence can occur when a person intentionally or recklessly uses physical force against, with or in the presence of a child without their consent, which causes, or could cause, the child harm. Physical violence can include hitting, punching, kicking, pushing or throwing something that strikes a child. It also includes the use of words or gestures that cause a child to believe that they are about to suffer physical violence.

Sexual abuse

Child sexual abuse is when a person uses power or authority over a child to involve them in sexual activity. It includes a broad range of behaviours involving a sexual element that are committed against, with or in the presence of a child. Sexual offences may involve contact, like touching or penetration. They also include acts that do not involve physical contact like 'flashing', possessing child abuse material or grooming.

Sexual misconduct

Sexual misconduct includes a variety of sexualised behaviours against, with or in the presence of a child. These behaviours may not meet the threshold for a sexual offence but can still pose a significant risk to children. Behaviours could include inappropriate conversations of a sexual nature, comments that express a desire to act in a sexual manner, or in some cases, behaviour that crosses a professional boundary, such as having or seeking to establish an inappropriate or overly personal or intimate relationship with a child.

SCHEDULE B: Statement of Alignment to the 11 Child Safe Standards

The 11 Child Safe Standards

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| Standard 1 | Organisations establish a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal children and young people are respected and valued. |
| Standard 2 | Child safety and wellbeing is embedded in organisational leadership, governance and culture. |
| Standard 3 | Children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously. |
| Standard 4 | Families and communities are informed and involved in promoting child safety and wellbeing. |
| Standard 5 | Equity is upheld and diverse needs respected in policy and practice. |
| Standard 6 | People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice. |
| Standard 7 | Processes for complaints and concerns are child-focused. |
| Standard 8 | Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training. |
| Standard 9 | Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed. |
| Standard 10 | Implementation of the Child Safe Standards is regularly reviewed and improved. |
| Standard 11 | Policies and procedures document how the organisation is safe for children and young people. |

Governance, Leadership and Culture: Standards 2, 10 and 11

SHMA believes that a child safe culture is led and modelled by our Board, Executive and senior leaders. Our governance arrangements facilitate the implementation of the Victorian Child Safe Standards, our Child Safety and Wellbeing Policy, Child Safety and Wellbeing Code of Conduct and related policies and strategies. We ensure the roles, responsibilities and obligations of our workers are clearly defined, we are held accountable, and we are transparent with our actions.

Policy and Procedures

Our policies and procedures support us to be a child safe organisation and are reviewed on a regular basis. All SHMA workers must demonstrate practices and behaviours that support our Child Safety Policy, Child Safety Code of Conduct and other supporting procedures and guidelines. All workers will be briefed on relevant policies and management will ensure ongoing compliance.

Continuous improvement

SHMA continuously improves our child safe and child friendly environments and actively seeks feedback from stakeholders (children, young people, schools, families/carers, SHMA workers) to do so. We acknowledge that there are always enhancements to be made; we ensure that we regularly review the organisation's performance, implement improvement plans and provide adequate resourcing to do so.

Suitable and supported people: Standards 6 and 8

The recruitment, selection, training and ongoing support and supervision of workers underpins SHMA's commitment to promoting an organisational culture of child safety.

Recruitment, screening and selection

For positions that involve contact (direct or indirect) with children and young people, selection policies and guidelines (including screening activities) will be based on selection criteria which clearly demonstrate an understanding of, and commitment to child safety.

All workers at SH undertake a pre-employment National Criminal Check, Working With Children Check and reference checking. Depending on the level of contact workers hold with children or young people, workers may also hold a current Victorian Institute of Teaching Registration (VIT).

Supervision and training

Workers will be adequately trained and supported to complete their roles in a child safe organisation, implement the Child Safe Standards and support the rights of children and young people. All SHMA workers will receive child safety related induction information, along with ongoing supervision and education to improve their child safety skills. Training will be appropriately resourced and recorded.

Safe environments and risk management: Standards 1 and 9

SHMA recognises our responsibility to proactively identify and reduce or remove risks to children and young people. Risk management strategies are in place to identify, assess, and minimise child safety risks, and these risks are managed via strategic and operational risk management registers. Wherever possible, children and young people will be involved in risk identification and mitigation strategies.

Site access and supervision

Children will be adequately supervised at all times at all SHMA sites. Adequate supervision refers to constant, active and diligent supervision where the responsible adult is in a position to observe each child in their care, respond to their individual needs, and immediately intervene if necessary.

Children under 16 are not permitted to visit SHMA unless accompanied by an adult.

During school camps appropriate SHMA worker ratios will be applied to activities. Children and young people (including students visiting as part of an excursion / camp) remain in the duty of care of an adult (either a teacher or another appropriate adult nominated by the school)

Physical spaces

SHMA provides safe and child friendly environments, with risk strategies in place for any physical space which children and young people may access. Safety assessments will be conducted on facilities/sites to ensure they are suitable and safe for SHMA activities with children and young people to occur. SHMA workers will be identifiable at activities and events.

Online spaces

SHMA workers will be aware of safe practices when communicating with children and young people via online and electronic systems. Online risks will be considered in risk management planning, along with opportunities for children and young people to report any concerns about electronic communication methods.

Engagement, participation and empowerment: Standards 1, 3, 4 and 5

Children and young people

SHMA consistently promotes the voices of children and young people and places a high priority on their participation and empowerment as community members. SHMA workers ensure that children and young people are aware of their rights and are supported to exercise them. We will consult with children and young people wherever possible, and they will inform our decision making.

SHMA will:

- provide all children and young people with a positive and enjoyable experience;
- enable access to a wide range of interesting and challenging activities, within a safe, inclusive and supportive environment; and
- empower children and young people to be creative through practical, hands-on experiences and education programs that encourage their independence and decision making.

Families and communities

SHMA understands that families, carers and guardians along with the broader community (partner organisations, sponsors, fundraisers, members and event participants) are key stakeholders, and all play a role in maintaining safe environments for children and young people and supporting SHMA to be a child safe organisation. We work in partnership with families and the community and facilitate regular communication and meaningful participation.

Equity and Diversity

SHMA believes all children and young people have the right to live safely and will not tolerate any form of bullying or harassment. The wellbeing of all children and young people is an indicator of a safe and friendly environment.

We acknowledge the needs of children and young people from diverse backgrounds, and promote:

- The safety of all children;
- Cultural safety of children and young people that identify as Aboriginal or Torres Strait Islander;

- Cultural safety of children and young people from culturally and linguistically diverse backgrounds;
- The safety of children and young people with a disability;
- The safety of children and young people of all gender and sexual identity (those that identify as LGBTQI+); and
- We will provide children and young people with access to information, support and complaints processes in ways that are culturally safe, accessible and easy to understand.

Receiving, responding to, and reporting concerns: Standards 3 and 7

SHMA works to ensure all children and young people, families, and workers understand their obligations and know who to tell if they are a victim of, or otherwise observe, abuse or inappropriate behaviour, or are a victim of same. SHMA takes every allegation of child abuse, harm and neglect seriously.

Complaints and concerns

SHMA will ensure clear and accessible complaint pathways are available for children, young people, their families, the broader community and workers.

All complaints will be treated seriously and responded to accordingly, with the best interests of children and young people as the priority. SHMA is committed to ensuring that such allegations are addressed in accordance with SHMA processes for responding to and reporting suspected child abuse.

SHMA will use the outcomes of complaints to review their child safe policies, practice and culture.

Responding to concerns, allegations and incidents

SHMA workers are required to respond in sensitive and appropriate ways to concerns, allegations, disclosures and incidents of child abuse, harm and neglect and will be supported to do so. Children, young people and their families (where applicable) will be consulted wherever possible throughout the process to ensure their rights and participation in decision making is upheld.

SHMA commits to undertaking prompt and effective investigations into allegations against SHMA workers, except where the investigation is a matter for law enforcement. Investigations will be conducted with the principles of procedural fairness, confidentiality and privacy and the outcomes of investigations and any improvement/changes to practice will be communicated to stakeholders as appropriate.

Reporting instances of child abuse, harm or neglect

SHMA will ensure that all concerns, allegations and incidents are reported via internal and external pathways, in line with legislated requirements. SHMA workers will co-operate with authorities and ensure all reporting obligations are met.

Privacy and confidentiality

All SHMA workers involved in the handling of allegations of child abuse or neglect will be mindful of the sensitive nature of the issue and take all reasonable steps to maintain confidentiality and

respect the privacy of those involved. In order for SH to perform its functions under the Child Safe Standards, it may be required to collect personal and/or sensitive information about workers and disclose that information to a third party. Personal information which is collected and/or disclosed about an individual will be managed in accordance with legislated requirements.

Record keeping

SHMA will ensure that accurate records of child safety related concerns, and associated investigations and outcomes, are collected and stored in line with best practice standards.

Historical allegations

SHMA may become aware of a disclosure of non-recent (historic) abuse from those who have attended or worked for SHMA in the past. SHMA commits to responding to such allegations in a sensitive and effective manner, noting that there may be a possibility that a person who abused a child or young person in the past may still be doing so, and criminal prosecutions may still take place even though the allegations are historical in nature.

SCHEDULE C: Policy Responsibilities

SHMA Board members are responsible for:

- Approval of the Child Safety and Wellbeing strategy and policy;
- Oversight of organisation-wide child safe practices;
- Ensuring appropriate resourcing is allocated to implementing child safe practice;
- Advocating for child safe practices both within SHMA and with partner organisations;
- Monitoring of organisational compliance to legislative requirements and key frameworks; and
- Ensuring processes are appropriately followed when a concerns of child abuse or harm arise.

Members of the SHMA Executive and Heads of Department are responsible for:

- Ensuring SHMA Child Safety and Wellbeing strategies and policies are implemented across the organisation;
- Managing strategic health and safety risks including the management of child safety risks;
- Prioritising child safe policies, procedures and practices at an operational level;
- Ensuring all workers are suitable, skilled and aware of their roles and responsibilities;
- Advocating for child safe practice with partner organisations;
- Ensuring organisational compliance to legislative requirements and key frameworks; and
- Role modelling an open and aware child safe and child friendly culture.

All SHMA workers are responsible for:

- Adhering to the Child Safety and Wellbeing Policy and all related procedures, codes of conduct, guidelines etc;
- Promoting child safe practice across the organisation;
- Identifying, mitigating and managing risks to children and young people;
- Ensuring knowledge regarding child safety is current, and undertaking training as required;
- Ensuring children and young people are engaged and are consulted about things that impact or affect them at SHMA; and
- Recognising, appropriately responding to, and reporting concerns of child abuse or harm.

Child Safety Officers are additionally responsible for:

- Receiving reports, complaints and concerns related to child safety and wellbeing, and referring these complaints to law enforcement or other agencies in line with legislative requirements