

Child Safety and Wellbeing Policy (AU & NZ)

This policy applies to APM Human Services International Ltd and all its Australian and New Zealand Subsidiaries (APM). It explains how we approach Child Safety and Wellbeing.

APM is committed to ensuring the safety and protection of all persons especially vulnerable persons such as children and young people whether they are a participant, client, or an employee. In Australia, state and territory governments are responsible for the administration and operation of child protection services. Legislative acts in each state and territory govern the way such services are provided. In response to the Royal Commission into Institutional Responses to Child Sexual Abuse, the Australian Government has developed the Commonwealth Child Safe Framework (**CCSF**) a government policy that sets out the minimum standards for child safe practices within Commonwealth entities. In New Zealand, organisations have a responsibility to protect children from abuse and neglect, as mandated by legislation such as the *Children's Act 2014* (NZ), which outlines the duties and standards for child protection. APM recognises it has a responsibility to develop, encourage and implement sound organisational practices to ensure that services are delivered, and work is conducted, in a safe and professional manner with a commitment to the [National Principles](#) for Child Safe Organisations (**National Principles**). At APM, child safety forms part of the overall APM Safeguarding Vulnerable Persons Framework which provides a consistent and connected approach to safeguarding vulnerable persons.

The National Principles listed below provide a national approach to embedding a child safe culture across the sectors of Australian society in which children are involved:

1. Child safety and wellbeing is embedded in organisational leadership, governance and culture.
2. Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.
3. Families and communities are informed and involved in promoting child safety and wellbeing.
4. Equity is upheld and diverse needs respected in policy and practice.
5. People working with children and young people are suitable, appropriately trained, and supported to reflect child safety and wellbeing values in practice.
6. Processes to respond to complaints and concerns are child focused.
7. Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
8. Physical and online environments promote safety and wellbeing while actively mitigating the opportunity for children and young people to be harmed.
9. Implementation of the national child safe principles is regularly reviewed and improved.
10. Policies and procedures document how the organisation is safe for children and young people.

Purpose

The purpose of this Policy is to provide APM employees and stakeholders with knowledge, guidance and instructions on how to effectively understand this Policy and the adopted strategies and actions taken to promote child wellbeing and prevent harm to children and minors.

APM is committed to ensuring child protection and safety through:

- Creating an environment where all children and minors feel safe and protected.
- Placing emphasis on genuine engagement with and valuing children's feedback.

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- Creating safe work environments that prevent harm to children.
- Ensuring staff can identify and address any actual or reasonable belief of risk of harm, harm, abuse and neglect towards a child.
- Ensuring that staff are aware of APM's processes on how to respond to any concerns, disclosures, allegations or risk of harm, harm, abuse or neglect towards children and minors.

Who is this for?

This policy applies to all APM directors, employees (permanent, temporary or casual), contractors, agents and consultants.

What you need to know

The CCSF sets out the below standards and obligations for creating and embedding child safe culture and practices. As such, APM will:

1. Undertake annual risk assessments in relation to the activities of each relevant service division to identify and determine the level of contact with children and young people, evaluate the risk of harm or abuse, and put in place appropriate strategies to manage identified risks.
2. Establish and maintain a system of training and compliance to make staff aware of, and compliant with, the CCSF and relevant legislation including applicable State and Territory Working with Children and Vulnerable Persons clearances and mandatory reporting requirements.
3. Adopt and implement the National Principles.

APM's Application of National Principles

Child safety and wellbeing is embedded in organisational leadership, governance and culture

The APM Executive Leadership Team (ELT) plays a key role in setting the ethical tone of the organisation and fostering and maintaining a culture that is an inclusive and welcoming environment for children and young people. This is supported through the ELT's endorsement of APM's Code of Conduct which is upheld holistically across the organisation creating a culture of accountability and transparency whilst ensuring APM staff uphold ethical and contractual standards in all dealings. APM's Code of Conduct also lists the expected behavioural standards and responsibilities for all APM staff. Information sharing and transparency is achieved by ensuring all levels of APM staff have access to APM's policies, procedures and commitments to child safety and protection.

APM's Risk Management Plan details specific strategies for the prevention / minimisation of risk of harm of children and young people.

Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously

APM is committed to fostering an organisational culture that supports children and young people's safety and wellbeing. APM value and respect children and young people's identity and culture and are equipped with knowledge and skills required in engaging with them and understanding their developmental needs. APM staff aim to foster and build upon children and young people's strengths and capacities in a safe and secure environment to assist them in achieving and realising their goals and aspirations. Children and young people are informed of their rights to be safe, feel safe, speak up, be listened to and to know how to raise a safety concern. Young people, who may have concerns

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for their own safety/wellbeing are informed of support and contact options via APM Child Safety Posters displayed in all public facing offices and via the APM website. All APM clients (participants), are provided with an explanation of their rights to be safe and participate in decisions that affect them. Explanations on participant rights is adapted to the individual (i.e., age / language appropriate) to ensure full understanding.

Families and communities are informed, and involved in promoting child safety and wellbeing

APM understands that parents, care givers and kin have the primary responsibility for the upbringing of their children and that there is wide variety in the structure of families and the role different family members may play in a child's life, their backgrounds, and cultures. As such, APM holds the view that parents, caregivers and kin are best placed to advise about their children's needs and capabilities. APM is committed to creating a safe environment, where children and their family members feel safe and their culture and identity are respected. APM ensures that children and minors have parent or legal guardian representation and that nominated parents, or legal guardians are actively involved in decision making and are given the opportunity to provide feedback to assist in improving APM's policies and procedures, especially those pertaining to child protection and safety. APM is committed to continuous improvement and welcomes feedback. As such, APM encourages participants (including children and their nominated guardians) to provide feedback in a safe and secure manner and has a transparent and readily accessible Feedback and Complaints Process.

Equity is upheld and diverse needs respected in policy and practice

APM recognises that children and young people have a diverse range of circumstances and experiences. At APM all dealings with children are conducted in a child centred approach which is aimed at empowering children and young people to participate more effectively in APM's service delivery model. APM's organisational culture acknowledges the strengths and individual characteristics of children, and celebrates all children and, their unique abilities, gender, social, economic, and cultural backgrounds. APM aims to create a safe and welcoming culture where children and young people feel comfortable, and services are provided in culturally safe and inclusive ways.

APM is an Equal Employment Opportunity (EEO) organisation and has recruitment and selection criteria along with processes ensuring that the hiring and recruitment process is open and transparent and free from bias and discrimination.

APM is also committed to reducing the risk of discrimination, exclusion, bullying, harm and abuse to all children and minors especially Aboriginal and Torres Strait Islander children, children with disability, children from culturally and linguistically diverse backgrounds, those who are unable to live at home, and lesbian, gay, bisexual, transgender and intersex children and young people.

APM staff also complete training modules to ensure that all staff understand APM's zero tolerance approach to bullying and discrimination in the workplace.

APM celebrates diversity and acknowledges and celebrates diversity, such as Harmony Day, NAIDOC and Reconciliation Week.

As part of our commitment to protecting the safety and wellbeing of all children, APM recognises the importance of Te Tiriti o Waitangi. Where a concern has been raised of abuse or neglect towards tamariki or rangatahi a culturally sensitive approach will be used, including liaison with Te Tai Tikanga Māori Team if identified as appropriate.

People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice

APM is committed to ensuring child protection, safety and wellbeing through all aspects of its dealings and processes. APM ensures that the best candidate is selected for the role by ensuring that APM's recruitment, selection and staff development policies are always followed. This includes conducting thorough pre-employment checks as well as other relevant checks, such as, National Police Checks and applicable State and Territory Working with Children and Vulnerable Persons Clearance.

APM's People and Culture team have implemented systems to ensure that Working with Children and Vulnerable Persons Checks remain current and valid pursuant to stipulated state and territory timeframes. This plays a key role in ensuring the safety and wellbeing of children and young people accessing APM's services.

APM staff participate in comprehensive induction and onboarding training including review and acceptance of APM's Code of Conduct. APM staff also receive training and supervision to ensure they have access to information and resources providing them with relevant knowledge and tools to better safeguard children and young people from risk of harm. All APM staff understand and are committed to child safety responsibilities and processes.

In New Zealand Child Protection Legislation (Children's Act 2014) requires all workers working with under 18-year-olds need to have a Child Safety Worker Check (CSWS) to support child safety. Current recruitment processes ensure that this check is completed, and employee's safety checks are updated every three years.

Processes to respond to complaints and concerns are child focused

Children and young people are encouraged to raise concerns in a manner they feel most comfortable, e.g., via their worker, an APM child safe champion, APM's dedicated child safe phone line, dedicated email or through the APM Complaints process. APM takes all feedback and complaints seriously and ensures that feedback and complaints are investigated and responded to in a prompt manner. APM's feedback and complaints processes are open and transparent to ensure that they are accessible and relevant to children, young people and their families. APM's Feedback and Complaints management process is in line with APM's Code of Conduct and ensures transparency in the method in which complaints are investigated, recorded and resolved. APM is committed to continuous improvement and uses the investigative findings of feedback and complaints to action. APM staff have access to information and training to assist them to provide appropriate support to children and young people whilst ensuring all legal requirements are met.

In New Zealand where child safety concerns are raised, staff have access to support via the Clinical Advisory Team and the Child Protection Officer.

In New Zealand the Child Protection Officer is responsible for ensuring that Child Protection is a key focus within APM, and that appropriate protocols, procedures and training are in place. APM must ensure that a Child Protection Officer is appointed. The designated person for child protection must:

- Be available and accessible to staff.
- Be a senior member of staff
- Have the authority to carry out the duties of the Child Protection Officer role
- Be capable of directing other staff if appropriate
- Be given comprehensive training and/or have experience of child protection

Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training

APM understands the importance of training and further ongoing education to enable staff to build on their knowledge and skills through meetings and discussions, team training opportunities and access to relevant publications and information sharing. This ensures that staff understand child development, safety and wellbeing. Applicable APM staff will participate in training to assist them in identifying indicators of child harm, allowing them to respond effectively to children, young people and their families as well as provide support to their peers and colleagues. Our code of conduct encourages team members to speak up if they identify risk of harm, abuse or neglect perpetrated by any person, including APM team members. The APM Child Safe Intranet page provides all staff with easy access to document controlled APM Child Safe policies, processes, work instructions and other resources to assist them in responding, in age and culturally appropriate ways, to children and young people disclosing or showing signs they are experiencing harm.

In New Zealand new staff working directly with children are required to complete the Introduction to Child Protection in New Zealand free online course available through Child Matters (<https://www.childmatters.org.nz/training.online-courses>). Refresher training is encouraged bi-annually.

Physical and online environments promote safety and wellbeing while preventing the opportunity for children and young people to be harmed

APM conducts regular audits to ensure that physical environments are safe, encouraging of children's development, and promoting their human rights. We promote a line-of-sight code of conduct where team members are not unnecessarily alone with children unless it is an essential component of the support required.

APM is aware that an increased reliance on and use of online platforms poses an increased risk of harm for children and young people. Despite the increased risk associated with an online presence, APM understands that online resources are a valuable and important tool to assist children and young people in gaining access to education, therapies, communication channels and a wide range of support services for assistance, relief and support during times of crisis.

As such, APM staff access and use online resources in accordance with APM's Code of Conduct. APM staff also receive training relating to the safe use of online systems and websites to identify and reduce areas of potential risk including, APM Security Code of Practice, Privacy Policy, Cyber Security and other relevant training.

Confidentiality and Information Sharing

The Safety of a child is paramount and at times a child is unable to speak for themselves therefore, APM has a responsibility to know when and how to share appropriate information with external agencies to protect the safety and wellbeing of children.

Although parents, guardians or caregivers of the child will usually be kept informed of concerns, there may be times when those with parental responsibility may not be informed. In this instance an anonymous notification can be made either by the Child Protection Officer or Therapist / Psychologist. This may happen when:

- The parent or caregiver is the alleged offender.
- It is possible the child may be intimidated into silence.
- There is a strong likelihood that evidence will be destroyed.

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- The child does not want their parent, guardian or caregiver involved and they are of an age where they are competent to make the decision.
- To protect the therapeutic relationship between therapist and client.

Under the *Privacy Act (2020) NZ*, the giving of information to protect children is not a breach of confidentiality. Wherever possible the family/ whānau should be kept informed of what information has been shared and to which agency and for what purpose.

If a member of staff raises a legitimate concern in good faith about suspected child abuse or neglect, which proves to be unfounded upon investigation, no civil, criminal or disciplinary proceedings may be brought against that staff member.

In Australia under the *Privacy Act 1988 (Cth)*, an organisation can only use or disclose personal information for a purpose for which it was collected, or for a secondary where an exception applies (APP 6).

Some of the exceptions to APP 6 include:

- where the individual has consented to a secondary use or disclosure;
- the individual would reasonably expect the APP entity to use or disclose their personal information for the secondary purpose, and that purpose is related to the primary purpose of collection, or, in the case of sensitive information, directly related to the primary purpose;
- the secondary use or disclosure is required or authorised by or under an Australian law or a court/tribunal order;
- a permitted general situation exists in relation to the secondary use or disclosure;
- the APP entity is an organisation and a permitted health situation exists in relation to the secondary use or disclosure;
- the APP entity reasonably believes that the secondary use or disclosure is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body;

Whether someone 'reasonably expects' is an objective one that has regard to what a reasonable person (properly informed) would expect in the circumstances.

A 'permitted general situation' includes:

- lessening or preventing a serious threat to life, health or safety;
- taking appropriate action in relation to suspected unlawful activity or serious misconduct;
- locating a person reported as missing;

OAIC Guidelines state that an organisation should only use or disclose the minimum amount of personal information sufficient for the secondary purpose.

Implementation of the national child safe principles is regularly reviewed and improved

APM is committed to continuous improvement and conducts regular review of its policies and procedures. APM reviews its Child Safety and Wellbeing Policy every 12 months and conducts reviews to ensure that organisational policies and procedures, including record keeping practices remain current and are being implemented by staff. APM staff also review the investigative findings and results of any related feedback and complaints and facilitate the update of the Child Safety and Wellbeing Policy, as required, to ensure that any concerns and potential risks are mitigated to prevent harm to children and young people.

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Policies and procedures document how the organisation is safe for children and young people

APM understands its role and responsibility in preventing harm to children and young people and the importance of having a clearly documented and transparent Child Safety and Wellbeing Policy that is accessible to all staff. APM's Child Safety and Wellbeing Policy ensures consistent application of child safe practices across all relevant APM divisions and adherence to child safety and wellbeing principles and practices.

Response to Suspected Harm, Risk of Harm, Abuse and/or Neglect

Any member of staff may directly witness or have allegations made by a child or an adult relayed to them with concerns of risk of harm, harm, abuse or neglect. Harm can occur in many different settings and forms and may come to light in a variety of different ways.

How is harm/abuse identified?

- Direct or indirect disclosure by the child.
- Direct or indirect disclosure from someone known to the child.
- Suspicions of harm/abuse or risk of harm by those involved with the child.
- Allegations and / or direct observations or signs displayed in the child's physical or emotional behaviour.
- Direct witnessing of harm/abuse.

What you should do if you have concerns

If you have concerns about a child or young person please contact your Child Safety Champion or the APM Legal Team so you can discuss the appropriate next steps with them. You are also required to report an incident via the incident reporting system.

Some staff are legally required to report if they suspect that a child is at risk of harm abuse or neglect to a child protection agency. They are called mandatory reporters and must comply with specific reporting obligations depending on which State and Territory they are located. If you are a mandatory reporter and experienced, confident and competent in child safety matters, you can proceed to make a formal report without first contacting your Child Safety Champion or the APM Legal Team, however, you are still required to report an incident via the internal incident reporting system.

While other staff may not be mandated reporters, it is APM's position that all staff have a duty of care to report any actual or suspected children at risk of harm, harm, abuse and neglect. As soon as a reasonable belief is formed that there is a risk of harm, harm/abuse and/or neglect of children or young people it must be reported to the relevant state or territory body.

The APM child safety reporting process ensures staff:

- can identify and address any actual or suspected incidents of risk of harm, harm, abuse towards a child.
- are aware of APM's processes on how to respond to any concerns, disclosures, allegations or suspected harm / risk of harm, neglect or abuse towards children and minors.
- understand APM's procedure for reporting and documenting child safety concerns and incidents.

Internal Contacts

Child Safety Champions List	<ul style="list-style-type: none"> Safeguarding Children and other Vulnerable People
APM Legal Team	<ul style="list-style-type: none"> Legal@apm.net.au

What if an immediate response is required to ensure a child's safety?

APM staff will ensure the immediate safety of the child and contact Australian Police (000) and Child Protection Services within the relevant State or Territory.

For New Zealand contact Police (111) and Child Protection Services within the relevant State or Territory or Oranga Tamariki in New Zealand (0508 326 459).

Where identifying team members are unable to contact the child protection agency, they will inform their senior manager who will facilitate timely reporting to the appropriate authority.

External Contacts

ACT	Child and Youth Protection Service: Call 1300 556 729 Or online report form Provision of Information to Child, Youth and Family Safety <ul style="list-style-type: none"> Children and Young Persons Act 2008
NSW	Department of Communities and Justice: Call 13 2111 Or E-report through the ChildStory reporter website Login for mandatory reporters. <ul style="list-style-type: none"> The Children and Young Persons (Care and Protection) Act 1998
VIC	Department of Families Fairness and Housing: Reporting is done by region during business hours: <ul style="list-style-type: none"> North Division: 1300 598 521 South Division: 1300 555 526 East Division: 1300 360 452 West Division: 1300 360 462 After hours emergency service call 131278 <ul style="list-style-type: none"> Child Wellbeing and Safety Act 2005
QLD	Department of Families, Seniors, Disability Services and Child Safety: Contact via regional intake services: Regional Intake Services Department of Families, Seniors, Disability Services and Child Safety After Hours 1800 177135 <ul style="list-style-type: none"> Child Protection Act 1999
SA	Department for Child Protection: Online use e-CARL system Process for mandated reporters Department for Child Protection Or call the Child Abuse Reporting Line 131 478 All serious harm reports and reports related to children in

	Child protection care must be through the phone line. <ul style="list-style-type: none"> • Child Safety (Prohibited Persons) Act 2016 • Children and Young People (Safety) Act (SA) 2017 • Statutes Amendment (Child and Sexual Abuse) Act 2021 • Criminal Law Consolidation Act 1935
NT	NT.Gov.au: Online via CARE Services Or call 1800 700 250 <ul style="list-style-type: none"> • Care and Protection of Children Act 2007
WA	Department of Communities: Online via Child Protection Concern Referral Form Or call 1800 273 889 during business hours or crisis care after hours on 1800 199 008 <ul style="list-style-type: none"> • Children and Community Service Act 2004
TAS	Department of Education, Children and Young People: Call Strong Families Safe Kids Advice and Referral Line 1800 000 123 <ul style="list-style-type: none"> • Child, Young Person and Their Families Act 1997
NZ	Oranga Tamariki 0508 326 459 <ul style="list-style-type: none"> • Refer to New Zealand Procedure in Promapp for Managing Child Concerns • Children, Young Persons and Their Families (Oranga Tamariki) Act 2017,

POLICE

When an emergency and harm is imminent - 000

When not an emergency – 13 14 44

FEDERAL GOVERNMENT

NDIS funded - NDIS Commission	NDIS Quality and Safeguards Commission 1800 035 544 https://www.ndiscommission.gov.au/providers/ndis-commission-portal
All other disability service funding	National Disability Abuse and Neglect Hotline 1800 880 052

ADDITIONAL CHILD RELATED REPORTING

VICTORIA

Commissioner for Children and Young People	Reportable conduct scheme CCYP Reportable Conduct Scheme 1300 78 29 78
Decision making tool	The Orange Door About The Orange Door vic.gov.au (www.vic.gov.au)

QUEENSLAND

Reportable conduct scheme	Due to be implemented July 2026
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TASMANIA

Office of the Independent Regulator	Reportable conduct scheme Reportable Conduct Scheme Office of the Independent Regulator (oir.tas.gov.au)
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WESTERN AUSTRALIA

The Ombudsman	Reportable conduct scheme Ombudsman Western Australia
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NEW SOUTH WALES

Office Children's Guardian	Reportable conduct scheme (02) 8219 3800 https://www.facs.nsw.gov.au/families/Protecting-kids/reporting-child-at-risk
New South Wales – Ageing and Disability Abuse Helpline	1800 628 221

SOUTH AUSTRALIA

Commission for children and young people	Does not require reporting over and above police, NDIS or child protection However requires that child safe polices are reviewed at a minimum every 5 years and that a compliance statement is lodged with the department of Human Service each time child safe polices are updated
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Related Policies & Procedures

[Managing and Reporting Child Safety Concerns/Incidents Procedure \(AU\)](#)

[Diversity Policy](#)

[Feedback & Complaints Policy](#)

[Privacy Policy](#)

[Child Safety Code of Conduct](#)

[Risk Management Framework](#)

[Safeguarding Vulnerable Clients Policy](#)

[Workplace Bullying, Discrimination and Harassment Policy](#)

Definitions

Term	Definition / Explanation / Details
Child	The United Nations Convention on the Rights of the Child (UNCRC) defines a child as everyone under 18 unless, "under the law applicable to the child, majority is attained earlier" . 2 Aug 2022
Child Protection	The protection of children from harm, risk of harm, violence, exploitation, abuse and neglect.
Child Abuse	<p>The World Health Organisation (WHO) defines child abuse and neglect as:</p> <p>All forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.</p> <p>Definitions of child abuse and neglect can include adults, young people and older children as the perpetrators of the abuse. It is commonly stated in legislation that the term 'child abuse and neglect' refers to behaviours and treatment that result in the actual and/or likelihood of harm to the child or young person. Furthermore, such behaviours may be intentional or unintentional and can include acts of omission (i.e., neglect) and commission.</p>
Client	A person who is receiving or has received a service from APM.

Code of Conduct	A code which sets out expected standards of behaviour and consequences for breaching it.
Commonwealth Child Safe Framework	The Australian Government policy that sets minimum standards for creating and embedding a child safe culture and practice in Commonwealth entities.
Customer	An agency or organisation to which APM provides a service e.g., government department, insurers, employers etc.
Incident	An unplanned or unexpected event or sequence of events that may, or may not, cause injury and/or property damage. This includes an accident or near miss that has occurred in the workplace or while performing work duties in the community.
Mandatory Reporting	The legislative requirement for selected groups of people to report suspected cases of harm, risk of harm, abuse and neglect towards children to government authorities.
National Principles for Child Safe Organisations	The National Principles for Child Safe Organisations provide a national approach to embedding a child safe culture across all sectors of Australian society in which children are involved.
Participant	A person who is receiving or has received a service from APM.

Review

This policy will be amended whenever requirements change and will be reviewed at least every 12 months.