

# CHILD SAFE ENVIRONMENTS POLICY

## Our Commitment

The Adelaide Holocaust Museum and Andrew Steiner Education Centre (AHMSEC) is committed to building and maintaining environments where children and young people are protected, respected, valued, heard, and encouraged to reach their individual potential. We will not tolerate bullying or harassment. We comply with the *Child Safety (Prohibited Persons) Act 2016* and the *Children and Young People (Safety) Act 2017*. Our commitment to creating a child safe environment is underpinned by the “National Principles for Child Safe Organisations” endorsed by the Commonwealth, and all state and territory governments.

The National Principles are:

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 and supported to reflect child safety and well-being 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 minimising 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.

AHMSEC provides in-person and online education programs to children and young people, who also form part of our general visitors. AHMSEC operates on the principle of ‘safely in, safely out’ for all whom interact with our institution, in person and on-line.

Our commitment and practices are inspired by Holocaust victim Henryk Goldszmit who, under the pen name of Janusz Korczak, published the ‘Declaration of Children’s Rights’ which was drawn upon by the United Nations when the Convention of the Rights of the Child was adopted in 1989.

## **Scope of the Policy**

This policy applies to all board members, staff, contractors, volunteers, and consultants (AHMSEC personnel) who work with children and young people or have access to their records. All personnel are obliged to assist in creating and maintaining a child-safe environment.

## **Communication**

AHMSEC will communicate this policy to staff and volunteers. It will also be available on the organisation's website.

## **Participation of Children and Young People**

AHMSEC values and respects the choices and views of children and young people accessing our programs. Any concerns or opinions raised by children, young people, their carers, or families shall be listened to. The organisation's Complaints and Feedback Procedure will be made publicly available through the website and provided to individuals on request.

## **Code of Conduct**

All members of the governing body, management, staff, volunteers, and contractors must adhere to AHMSEC's Code of Conduct, which specifies standards of care when dealing and interacting with children and young people (Schedule 2). All staff and volunteers must sign the Code of Conduct on commencement.

## **Recruitment**

AHMSEC has Employment Screening and Clearance processes as part of its recruitment policy (See Schedule 3) which complies with the requirements under the *Child Safety (Prohibited Persons) Act 2016*. The policy requires all employees and volunteers working with children and/or young people to undergo relevant child-related employment screening checks including Working with Children Checks and a National Police Check before appointment.

## **Supervision**

AHMSEC has processes in place to supervise, train and support employees and volunteers to understand their mandatory reporting obligations and their responsibilities to create a child safe environment.

## **Staff Induction**

All employee and volunteer induction programs shall include orientation to this policy, including its Code of Conduct and mandatory reporting requirements.

All new staff and volunteers who may have contact with children or young people will also be guided through the application of the policy.

## **Training and Development**

AHMSEC will offer development opportunities, training, and refresher training about child safety topics to volunteers and also provide support in making mandatory notifications where required. All staff and volunteers will have access to web-based resources about issues concerning child safety and wellbeing. All mandated notifiers are required to undertake *Responding to Risks of Harm, Abuse and Neglect – Education and Care* training. This training is to be refreshed at least once every five years.

## **Reporting and Responding to Harm or Risk of Harm**

All mandated notifiers within AHSMEC have a legal obligation to notify CARL as soon as practicable if they suspect on reasonable grounds that a child is or may be at risk of harm.

Mandated notifiers in our organisation are employees who:

- provide a service directly to children or young people
- hold a management position in the organisation the duties of which include direct responsibility for, or direct supervision of, the provision of those services to children and young people.

Even if not a mandated notifier, AHMSEC encourages voluntary reporting of suspected harm or risk of harm to children. All AHMSEC personnel shall be supported and encouraged to report the reasonable belief that a child or young person is or may be at risk of harm regardless of whether they are legally obligated to.

Mandated notifiers within the organisation shall be trained and made aware about their legal obligation to report a reasonable belief that a child or young person has been harmed or is at risk of harm through Child Abuse Report Line (CARL) on 13 14 78 as soon as practicable or if at immediate risk, report to South Australia Police on 000.

The person who identifies the harm is the person to make the report. Following a report to authorities, an internal report is required.

If a person in our organisation is reported for causing harm to a child or young person, they will be removed from any role that has contact with children or young people until authorities conclude their investigation.

If a child reports concerns about safety, staff and volunteers must ensure they are treated with sensitivity and in a culturally safe manner. The child or their carers/families should be directed to services that can provide them with the appropriate support to manage a difficult or traumatic experience such as the Kids Helpline on 1800 55 1800.

Any failure to report a reasonable suspicion that a child has or is being harmed or is at risk of harm is in breach of the Child Safe Environments Policy and may result in disciplinary action being initiated. Under provisions of the *Children and Young People (Safety) Act 2017*, section 31(1), failure to report suspicion of harm or risk of harm to a child by a mandated reporter may result in a penalty of up to \$10,000. Under the *Criminal Law Consolidation Act 1935*,

section 64A, failure to report sexual abuse of a child by another personnel member may result in up to 3 years imprisonment and failure to protect a child from sexual abuse by another personnel member under section 65 may result in a maximum of 15 years imprisonment.

### **Reporting and responding to general complaints and feedback**

AHMSEC takes seriously all concerns and complaints. Each complaint is handled in line with the organisation’s Feedback and Complaints Procedure (refer to Schedule 1).

### **Risk management**

Child safety risks shall be included in the organisation’s risk management policy and processes through the risk management plan. This includes risks in physical and online environments relevant to the programs provided by AHMSEC, people in contact with children, and any specific vulnerabilities of the children.

All staff dealing with children shall endeavour to reduce the risk of harm to children and identify ways to promote child protective factors in the context of the organisation.

<b>Identified risk</b>	<b>Actions to minimise risk</b>
Culture of organisation is not child-safe focused	<ul style="list-style-type: none"> <li>● child focused Code of Conduct is in place that sets the behavioural standards expected including what happens when a breach occurs</li> <li>● culture of management reflects our strong commitment to the safety of children and young people</li> <li>● the National Principles for Child Safe Organisations are embedded in policies and procedures</li> </ul>
Organisational staff (including employees, volunteers) harm children/young people	<ul style="list-style-type: none"> <li>● recruitment processes including undertaking referee checks to ensure the suitability of persons before they are employed/volunteer with our organisation</li> <li>● interview questions (no prior preparation) should gauge an applicant’s understanding of child safe principles</li> <li>● organisational staff have a Working with Children Check (WWCC) with a ‘not prohibited’ result prior to working with children or young people</li> </ul>

	<ul style="list-style-type: none"> <li>• WWCCs updated as required and status remains as not prohibited</li> </ul>
Organisational staff do not understand their obligations to report harm and risk of harm to the Child Abuse Report Line (or SA Police if child/young person is at immediate risk)	<ul style="list-style-type: none"> <li>• all organisational staff are provided with orientation to the Child Safe Environments Policy.</li> <li>• all organisational staff and volunteers are required to sign the Code of Conduct on commencement</li> </ul>
Inappropriate physical contact	<ul style="list-style-type: none"> <li>• unnecessary physical contact is not allowed</li> </ul>
Inappropriate online communications	<ul style="list-style-type: none"> <li>• organisational staff must not communicate with children or young people via social media</li> </ul>
Risks during transport of children and young people	<ul style="list-style-type: none"> <li>• organisational staff must not transport a child or young person as part of their professional duties</li> <li>• should organisational staff transport a child or young person for whom they are parent or guardian (temporary or legal) in a private, personal capacity, the organisation does not assume responsibility for the transportation. Staff must ensure that any such transport does not create any actual or perceived conflict of interest or compromise their professional responsibilities</li> </ul>
Lack of supervision	<ul style="list-style-type: none"> <li>• children and young people are to be supervised by parents/guardians or teachers at all times</li> </ul>
Inappropriate taking images of children and young people	<ul style="list-style-type: none"> <li>• photographs of student visitors and other guests will not be taken without documented consent</li> <li>• if photography may be planned, consent for that photography, with information about how images could be used, will be requested of schools to request of students or their parents/guardians</li> </ul>
Physical environment	<ul style="list-style-type: none"> <li>• maintain a risk register that is reviewed annually to ensure effectiveness</li> <li>• conduct risk assessments for any new activities</li> </ul>

	<ul style="list-style-type: none"><li>• ensure all equipment is in good working order</li></ul>
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### **Review**

AHMSEC will review this policy at least once every five years in line with the *Children and Young People (Safety) Act* (s.115)) or after the occurrence of a critical incident where a child or young person has experienced harm through involvement in AHMSEC. The policy will also be reviewed upon Identification of any added risks for children or young people, or any concerns raised regarding their safety or welfare. A new compliance statement will be lodged with the Department of Human Services each time the policy is reviewed and updated.

Any changes made to the policy will be approved by the Board.

## FEEDBACK AND COMPLAINTS PROCEDURE

There may be times when AHMSEC does not meet your expectations. In these circumstances, we encourage you to let us know. We are committed to learning from your experiences as it will help us to continually improve the services we deliver and our visitor experience.

AHMSEC has a structured approach to resolving complaints.

### 1. Send a Complaint

If you are dissatisfied with a service provided by AHMSEC, you can lodge a complaint with us addressed to AHMSEC Inc, PO Box 3390, Rundle Mall 5000 SA or by email at [admin@ahmsec.org.au](mailto:admin@ahmsec.org.au).

Please include in your complaint the following details.

- a. Your name and contact details.
- b. The nature of the complaint
- c. Details of any steps you have already taken to resolve the complaint
- d. Details of conversations you may have had with us that may be relevant to your complaint
- e. Copies of any documentation which may be relevant

If insufficient information is provided, AHMSEC may not be able to or may elect to not address the complaint.

### 2. Evaluation

AHMSEC will take note of what information you provide to us. This information will be passed on to the appropriate executive staff and/or Board member to deal with the complaint.

AHMSEC is committed to resolving your complaint in a timely manner.

### 3. Response

AHMSEC will keep in touch with you during the process. If you require support, please email [admin@ahmsec.org.au](mailto:admin@ahmsec.org.au). Once we have finalised your complaint, we will advise you of our findings and any action we have taken.

## Schedule 2. Code of Conduct

All members of AHMSEC's governing body, management, staff, volunteers, and contractors must adhere to this Code of Conduct.

## **They will**

- Respect that all children accessing AHMSEC's services have a right to feel and be safe.
- Treat all children with dignity, equality, and respect.
- Be aware and responsive to the particular needs and vulnerabilities of children (such as age, language barriers, developmental capabilities, disability, or mental health).
- Ensure clear age-appropriate or developmentally appropriate explanations are provided to children during the program.
- Be alert to children who may be at risk of harm and make reports as necessary to the Child Abuse Report Line (13 14 78).
- Ensure that complaints procedures are available on the AHMSEC website and on request.
- Ensure physically and socially safe environments for children that are free of any identifiable hazards.

## **They will not:**

- Discriminate against any child because of age, gender, cultural background, religion, vulnerability, or sexuality.
- Develop any relationships with children outside of the professional relationship. Where an employee knows a child outside of AHMSEC, they are expected to maintain professional boundaries during all interactions associated with AHMSEC activities.
- Take part in any unnecessary physical contact with a child.
- Take a child to their home under any circumstances.
- Go to a child's home without documented line manager's approval.
- Provide any personal contact details to a child.
- Behave and/or communicate in a way that could be interpreted as being sexually suggestive even as a joke, nor allow a child to communicate or behave in such a way. The child must be immediately told that their behaviour or comment is unacceptable and inappropriate.

Any person can make a complaint to AHMSEC about the breach of this Code of Conduct under the organisation's Feedback and Complaint Procedure (See Schedule 1). AHMSEC will investigate the breach in line with the Feedback and Complaint Procedure. If personnel of AHMSEC are found to be in breach of the Code of Conduct, they may face disciplinary action and possible termination of employment, dependent on the extent of the breach.



### **Schedule 3. Embedding Child Safety Environment into Our Recruitment & Selection**

AHMSEC staff and volunteers are part of a team who are guided by shared values and goals, dedicated to Holocaust education, research and remembrance. The purpose of our work is to strive to combat antisemitism, racism and prejudice.

AHMSEC is committed to the safety and protection of children and young people, with a zero tolerance for harm or risk of harm to children.

As part of AHMSEC's commitment to children and young people's safety, child safety standards are embedded into the recruitment and selection process, emphasising that each individual has a shared commitment to child safety and this is a core requirement for working and volunteering at the AHMSEC.

Our commitment to a Child Safe Environment is demonstrated in each of the following:

- position vacant advertisement, and
- position description, and
- letter of offer of employment being contingent on a current working with children check and national police check, and
- throughout the rigorous onboarding process, and
- ongoing training and development being available throughout their employment/volunteering

In accordance with the *Child Safety (Prohibited Persons) Act 2016*, our organisation is registered with the Department of Human Services Screening Unit and we link Working with Children Checks (WWCC) to our registration.

All persons running the organisation (board members and directors) and all employees over the age of 14 years old who work in a role with children and young people must hold a current, not prohibited WWCC issued by the Screening Unit of the Department of Human Services, provide evidence of this prior to working with children or young people, and renew the WWCC every 5 years. We will verify the accuracy of all WWCCs in the DHS Screening Unit portal as required by law.

We will immediately contact the Department of Human Services Screening Unit if we become aware of assessable information regarding any person involved with our organisation, such as a serious criminal offence, child protection information, or assessable disciplinary or misconduct information.