



Barça Academy Safeguarding Children and Young People Policy

1. Purpose

The purpose of this policy is to ensure that Barça Academy (BA) provides a safe, inclusive, and empowering environment where all children and young people are protected from abuse, harm, and neglect.

BAA recognises that abuse can be perpetrated by anyone; including parents and caregivers, guardians or supervisors, people engaged by BAA, members of the public, and other children or young people and is committed to taking all necessary steps to prevent and respond to such harm.

BAA has **zero tolerance** for any form of child abuse, neglect, or exploitation. This policy establishes the shared responsibility of the Board, staff, contractors, and volunteers to:

- Prioritise the safety and wellbeing of children and young people in every aspect of our work.
- Uphold and protect the rights of children and young people to feel safe, be safe, and have their voices heard.
- Foster a culture where children and young people are welcomed, included, respected, and safe in all BAA environments, both physical and online.
- Ensure every person within BAA understands their role in safeguarding children and young people.
- Actively safeguard children by:
 - adhering to this policy and the Safeguarding Children and Young People Code of Conduct
 - reporting any concerns, allegations, or incidents of abuse or neglect to BAA management and/or external authorities, including police, regardless of who the alleged perpetrator may be.

This policy sets the foundation for BAA's commitment to continually improving our child safety culture and meeting all requirements of the Child Safe Standards.

2. Scope

This policy applies to **all people associated with BAA** who have contact with, or responsibilities relating to, children and young people. This includes:

- Board members and committee members
- Employees (full-time, part-time, casual, and temporary)
- Volunteers
- Contractors, consultants, and service providers engaged by BAA
- Students on placement, interns, and work experience participants
- Any other individual representing or acting on behalf of BAA

This policy applies to all **BAA environments**, including:

- Physical locations, programs, and activities operated or funded by BAA
- Online and digital environments used for service delivery, communication, or engagement
- Off-site activities, events, excursions, or programs where BAA has responsibility for children and young people
- External settings where BAA personnel interact with children and young people as part of their role

All individuals within the scope of this policy are required to understand, comply with, and uphold BAA's child safeguarding expectations and obligations at all times.



3. Definitions

The following definitions apply throughout this policy and are aligned with the Child Safe Standards to ensure a consistent understanding of key concepts.

Term	Definition	Relevant Child Safe Standard(s)
Child / Young Person	Any person under the age of 18 years.	1, 3, 5, 10
Abuse	Any act that causes significant harm to a child, including physical, sexual, emotional/psychological abuse, and neglect.	1, 7, 9
Neglect	Ongoing failure to provide for a child's basic needs, including food, shelter, medical care, education, supervision, or emotional nurturing.	1, 7, 9
Exploitation	The misuse of a child for personal, familial, commercial, or other gain, including sexual exploitation and labour.	1, 7, 9
Harm	Any detrimental effect on a child's physical, psychological, or emotional wellbeing.	1, 7, 9
Grooming	Actions undertaken to manipulate or prepare a child for abuse, often involving trust-building or coercion.	1, 6, 7
Mandatory Reporter	A person legally required to report suspected child abuse or neglect to relevant authorities.	7, 8
Child Safety Risk	Any situation, activity, environment, or behaviour that has the potential to cause harm to a child.	1, 2, 9
Staff / Personnel	All employees, volunteers, contractors, consultants, and others working or representing BAA.	2, 6, 8
Child-Safe Environment	Physical or online settings where children are protected from abuse, feel safe, respected, and supported to express their views.	1, 3, 4, 5, 10
Incident / Concern	Any situation where a child's safety or wellbeing may have been compromised or threatened.	7, 9, 11
Code of Conduct	A set of behavioural standards that staff, volunteers, and contractors must follow to safeguard children.	2, 6, 8
Safeguarding	The proactive measures and practices designed to protect children from harm, abuse, and neglect.	1–11
Higher-Risk Activities	Activities, programs, or settings where the likelihood of harm to children is elevated (e.g., overnight stays, online interactions, offsite excursions).	3, 4, 9
Third-Party Contractors	Individuals or organisations engaged to provide services to children on behalf of BAA.	6, 9
Continuous Improvement	Processes for reviewing incidents, monitoring practices, and updating policies to enhance child safety.	11



3. Policy

3.1 Commitment to Child Safety and Wellbeing (Standard 1)

Zero Tolerance Statement

BAA has a **zero-tolerance policy** for any form of child abuse, neglect, exploitation, or harm. All children and young people have the right to feel safe and be safe. This includes Aboriginal children, whose unique cultural identity and experiences are respected, valued, and supported. Any breaches of this commitment will be treated seriously, with appropriate action taken, including reporting to external authorities where required.

Principles Guiding Child Safety

BAA's approach to child safety and wellbeing is guided by the following principles:

1. **Child-Centred Focus** – The safety, wellbeing, and best interests of children and young people are the primary consideration in all decisions and activities.
2. **Respect, Inclusion, and Cultural Safety** –
 - Aboriginal children are encouraged and supported to express their culture and enjoy their cultural rights.
 - Staff, volunteers, and leaders actively facilitate the participation and inclusion of Aboriginal children and their families within all programs and activities.
 - The organisation recognises the strengths of Aboriginal culture and its critical role in the wellbeing and safety of Aboriginal children.
 - Discrimination, including racism, is not tolerated, and any incidents will be addressed promptly, with consequences for those responsible.
3. **Prevention of Harm** – All staff, volunteers, and contractors actively identify, prevent, and manage risks to children, including those arising in culturally diverse contexts.
4. **Empowerment and Participation** – Children and young people, including Aboriginal children, are encouraged and supported to express their views, make decisions, and participate in matters that affect them.
5. **Shared Responsibility** – Protecting children is the responsibility of everyone at BAA, from the Board and leadership team to staff, volunteers, and contractors.
6. **Transparency and Accountability** – Policies, procedures, and practices for safeguarding children are clear, accessible, and consistently applied, with accountability for all actions.
7. **Continuous Improvement** – BAA actively reviews its child safety practices and policies, learns from incidents, and improves its systems to strengthen protection for all children, including Aboriginal children and young people.

Leadership Responsibilities

- Ensure the organisation's commitment to Aboriginal cultural safety is embedded in all policies, procedures, and practices.
- Promote understanding and appreciation of Aboriginal culture across the organisation.
- Lead by example in fostering inclusion, participation, and respect for the diverse identities of Aboriginal children and families.

This commitment ensures that all children, particularly Aboriginal children, experience safe, supportive, and culturally inclusive environments in which they are valued, respected, and empowered.



3.2 Roles and Responsibilities (Standard 2)

BAA recognises that creating and maintaining child-safe environments requires **clear roles, responsibilities, and accountability** at all levels of the organisation. This section outlines the expectations and practices for each group, aligned with all Child Safe Standards.

Board and Leadership Responsibilities

- **Governance and Culture:** Promote a child-safe culture and embed child safety into organisational decision-making.
- **Policy Oversight:** Ensure all child safety policies and procedures are implemented, monitored, and reviewed regularly.
- **Risk Management:** Oversee organisational risk assessments and management plans for physical and online environments, and for higher-risk activities.
- **Recruitment and Screening:** Ensure staff, volunteers, and contractors are appropriately recruited, screened, and inducted in line with child safety requirements.
- **Reporting and Accountability:** Monitor compliance with mandatory reporting and internal reporting procedures.

Management Responsibilities

- **Implementation of Policy and Procedures:** Ensure staff, volunteers, and contractors understand and follow child safety policies, procedures, and the Code of Conduct.
- **Training and Support:** Provide regular child safety training and support to all personnel.
- **Incident Response:** Respond promptly and appropriately to all reports, disclosures, or suspicions of abuse, in line with mandatory reporting obligations.
- **Risk Monitoring:** Identify, assess, and mitigate risks to children in all programs, activities, and environments.
- **Engagement:** Facilitate participation of children and young people in decisions affecting their safety and wellbeing.

Staff, Volunteers, and Contractors Responsibilities

- **Compliance and Conduct:** Follow all child safety policies, procedures, and the Safeguarding Children and Young People Code of Conduct.
- **Vigilance and Prevention:** Actively identify and report potential risks or unsafe behaviours in physical and online environments.
- **Mandatory Reporting:** Report any concerns, suspicions, or disclosures of child abuse to management and/or relevant authorities.
- **Participation Support:** Encourage children and young people to express their views safely and respectfully.
- **Continuous Improvement:** Contribute to the review of policies, practices, and programs to strengthen child safety.

Children and Families

- **Participation:** Children and young people are encouraged and supported to express their views and provide feedback about their experiences with BAA programs and services.
- **Education:** Families are informed about child safety expectations and policies to support safe engagement.

Shared Responsibility

Protecting children and young people is **everyone's responsibility**. All members of the BAA community, regardless of role, must uphold these responsibilities and actively contribute to a child-safe environment.



Accountability

Failure to comply with these responsibilities or breaches of child safety policies may result in disciplinary action, termination of employment or engagement, and notification to external authorities as required by law.

3.3 Involving Children and Young People (Standard 3)

BAA recognises that children and young people have the **right to be heard, respected, and actively involved** in decisions that affect their safety, wellbeing, and experiences within the organisation. Meaningful participation strengthens the child-safe culture and ensures that policies and practices reflect children's needs, including the diverse needs of Aboriginal children and those from other cultural backgrounds.

Principles Guiding Participation and Empowerment

1. **Respect for Children's Rights** – All children, including Aboriginal children, have the right to express their views, make decisions, and have their opinions considered in matters affecting them.
2. **Empowerment** – Children are supported to build confidence, self-advocacy skills, and understanding of their rights. Staff and volunteers actively promote children's agency in safe and developmentally appropriate ways.
3. **Inclusive Participation** – Aboriginal children and children from diverse backgrounds are actively supported to participate in decision-making, planning, and program evaluation, in culturally safe and accessible ways.
4. **Safe Expression** – Children can raise concerns, complaints, or suggestions **safely, confidentially, and without fear of retaliation.**

Practical Measures for Child Participation

- **Feedback Mechanisms:** Regularly seek input from children on programs, services, and their experiences of safety and inclusion, including culturally specific considerations for Aboriginal children.
- **Decision-Making Opportunities:** Include children in planning activities, program design, and policy consultation where appropriate.
- **Accessible Communication:** Provide age-appropriate, culturally relevant, and accessible ways for children to share their views.
- **Cultural Expression:** Encourage children, particularly Aboriginal children, to express their culture, identity, and perspectives as part of participation initiatives.
- **Rights Education:** Educate children on their rights, what constitutes safe or unsafe behaviour, and the supports available to them.

Staff, Volunteers, and Leadership Responsibilities

- Facilitate children's participation in all matters that affect them, including culturally appropriate engagement of Aboriginal children and their families.
- Support children to understand their rights and encourage them to speak up about safety, inclusion, or wellbeing concerns.
- Respect and act on children's views where possible, ensuring their input informs decisions, programs, and policy improvements.

Families and Community Engagement

- Families, including Aboriginal families, are involved in supporting children's participation while respecting the child's voice and agency.
- Collaboration with families ensures decisions balance children's safety, cultural identity, and wellbeing.



Through meaningful participation and empowerment, children, including Aboriginal children experience environments where their voices are valued, their rights are respected, and their perspectives influence decisions affecting their safety and wellbeing.

3.4 Working with Families and Communities (Standard 4)

BAA recognises that families and communities play a vital role in supporting the safety, wellbeing, and cultural identity of children and young people. Strong partnerships with families enhance trust, support children's empowerment, and strengthen the organisation's overall child-safe practices.

Principles Guiding Family and Community Involvement

1. **Respect and Inclusion** – Families are respected as key partners in supporting children's safety, wellbeing, culture, and participation.
2. **Transparent Communication** – Families receive clear, timely, and relevant information about BAA's programs, child safety policies, and expectations.
3. **Cultural Responsiveness** – Family engagement practices are inclusive and culturally safe, particularly for Aboriginal families and families from culturally and linguistically diverse backgrounds.
4. **Shared Responsibility** – Families and the organisation work together to support the safety and participation of all children.

Ways Families and Communities Are Involved

BAA's policies support and encourage active involvement of families and communities through:

- Opportunities to provide feedback on programs, activities, and child safety practices.
- Inclusion in decision-making processes where appropriate, especially in relation to activities involving their children.
- Communication about the rights of children and the organisation's child safety expectations.
- Engagement with community leaders, Elders, Aboriginal community-controlled organisations, and other trusted community representatives to support cultural safety.
- Collaboration with families to understand children's needs, cultural identity, and individual circumstances.

Complaints and Information Sharing with Families

BAA's complaint-handling processes are child-focused and include clear procedures for **keeping families informed** while ensuring confidentiality, privacy, and safety obligations are maintained.

When a concern or complaint is raised:

- Families will be informed of the concern, the steps being taken to respond, and any outcomes that can be lawfully shared.
- Information will be provided in a sensitive, respectful, and culturally appropriate manner.
- Confidentiality and privacy obligations will be adhered to at all times, including not sharing information that may place a child or another person at risk, or that is restricted by legal or investigative requirements.
- Families will be supported to understand reporting pathways, including internal reporting, mandatory reporting, and engagement with external authorities.
- Where complaints involve Aboriginal children or communities, communication will occur in a culturally safe and respectful way, including the option of involving trusted community members or Aboriginal liaison personnel.



Through meaningful collaboration with families and communities, BAA strengthens children's safety, supports cultural identity, enhances transparency, and ensures that children and families feel informed, respected, and involved in all matters affecting their safety and wellbeing.

3.5 Equity Is Upheld and Diverse Needs Respected in Policy and Practice (Standard 5)

BAA is committed to creating an environment where **all children feel safe, supported, respected, and included**, regardless of their background, identity, abilities, or circumstances.

We recognise that some children experience **additional barriers to safety and participation**, and we actively work to remove these barriers across all programs, communications, and decision-making.

Our Commitment to Equity and Inclusion

BAA will:

- Ensure all children have **equal access** to safety, participation, information, and support
- Provide **inclusive, accessible, and culturally safe environments**
- Recognise and support the **diverse needs** of children related to culture, disability, gender identity, sexuality, language, mental health, trauma, or family circumstances
- Take action to prevent **bullying, discrimination, exclusion, or harassment**
- Ensure children and families can access **multiple ways** to communicate, participate and seek help

Avenues for children and families to share individual needs

Children and families are encouraged to share their individual needs with staff at any time.

BAA provides multiple safe, confidential ways to do so, including during enrolment, intake conversations, ongoing check-ins, and through our Safeguarding Lead, Jenna Emmanouel via barca@newstartau.com.au.

We understand that **treating children fairly does not always mean treating them the same**. We adopt flexible, child-centred approaches to ensure every child feels safe and valued.

Commitment to the Cultural Safety of Aboriginal Children

BAA is committed to:

- Creating culturally safe spaces where Aboriginal children feel **proud, connected, and respected**
- Supporting children to express their **culture, identity, and connection to Country**
- Building relationships with Aboriginal families, community-controlled organisations, and Elders
- Embedding cultural safety in our programs, environment, policies, and staff practice
- Preventing, identifying and responding to **racism**
- Ensuring staff understand how cultural harm impacts child safety
- Upholding Aboriginal children's rights to enjoy, share and celebrate their culture

Racism, discrimination or cultural insensitivity will not be tolerated and may result in disciplinary action.



Supporting Children with Disability and Additional Needs

BAA acknowledges that children with a disability can face greater risks of abuse and harm.

We will:

- Provide **reasonable adjustments** to support inclusion
- Use accessible communication formats (visual supports, Easy English, assistive technology, interpreters)
- Support children who use devices, communication aids, or alternative methods of expression
- Train staff in **inclusive practice, communication, and recognising signs of abuse**
- Consult with families and support professionals to understand each child's unique needs

No child will be excluded from participation due to disability or support needs.

Preventing Racism, Discrimination and Bias

BAA is committed to environments free from:

- Racism
- Ableism
- Sexism
- Homophobia or transphobia
- Bullying or harassment
- Cultural stereotyping
- Discriminatory language or behaviour

All staff, volunteers and contractors must:

- Actively challenge racism and bias
- Report discriminatory behaviour
- Model inclusive and respectful language
- Support children harmed by discrimination
- Apply fair, culturally safe, child-centred practices

Leaders are responsible for setting expectations and modelling inclusive behaviour.

Accessible Communication and Participation

We ensure that:

- Information is provided in **multiple accessible formats**
- Interpreters and translation support are available where needed
- Children can express themselves in the communication style that feels most comfortable
- Families are consulted in culturally respectful and appropriate ways
- Activities are adapted to support safe participation for all children

Children and families have the right to participate in decisions that affect them and to have their voices respected.

Staff Responsibilities

All staff, volunteers and contractors must:

- Understand and apply inclusive, trauma-informed, and culturally safe practice
- Respect the identities and experiences of all children
- Report any behaviour that breaches inclusion, anti-discrimination, or cultural safety expectations
- Participate in training on cultural safety, disability inclusion, trauma and equity
- Support children with additional needs and remove barriers to participation



Continuous Improvement

BAA will:

- Review programs and environments to remove barriers
- Seek feedback from children, families and communities especially those with diverse needs
- Monitor and address any concerns related to racism, exclusion or inequity
- Use feedback and data to improve cultural safety, accessibility and inclusion

3.6 People Working with Children and Young People Are Suitable and Supported (Standard 6)

BAA is committed to ensuring that all staff, volunteers, contractors, and leaders who work with children and young people are **suitable, capable, and supported** to promote and uphold the organisation's child safety and wellbeing values in practice. This applies to recruitment, induction, supervision, and ongoing professional practice.

Recruitment and Appointment Practices

BAA's recruitment practices reflect our commitment to child safety and wellbeing. All recruitment processes:

- Include the organisation's **public commitment to child safety** in advertising and position listings
- Clearly outline **child safety responsibilities** in position descriptions, including expectations for behaviour, professional boundaries, cultural safety, and inclusion
- Require candidates to demonstrate understanding of and commitment to **child safety and wellbeing values**
- Use structured, child-focused interview questions to assess suitability to work with children and young people
- Require candidates to provide **referees** who can confirm their suitability to work with children

Pre-Employment Screening

To ensure only suitable people work with children, BAA conducts thorough pre-employment screening, including:

- **Working with Children Check (WWCC)** or equivalent registration for all jurisdictions
- Criminal history checks and other relevant background checks
- Verification of professional qualifications and references
- Any additional registration requirements relevant to the role
- Ongoing verification where required by legislation

No person will commence work with children until all relevant checks have been completed and deemed satisfactory.

Induction and Orientation

All new staff, volunteers, and contractors receive a comprehensive induction that covers:

- The Safeguarding Children and Young People **Code of Conduct** and expected professional behaviour
- The Safeguarding Children and Young People Policy and associated procedures
- Reporting obligations for suspected or observed child abuse or neglect
- The Safeguarding Children and Young People **Complaints Handling Policy** and procedures, including child-friendly and culturally safe procedures
- Record keeping and information sharing obligations



- The organisation's **values, culture, and commitment to equity, inclusion, and cultural safety**
- Practical guidance on recognising and responding to signs of harm or abuse

Inductions are documented, and staff are required to acknowledge their understanding and commitment.

Supervision, Support, and Ongoing Suitability

BAA provides structured supervision, mentoring, and performance management to ensure staff and volunteers **continue to meet child safety expectations**, including:

- Regular supervision sessions that include discussion of **child safety practices and concerns**
- Monitoring of adherence to the Code of Conduct, child safety policies, and professional boundaries
- Performance feedback related to child safety, equity, and inclusion
- Provision of training and professional development on child safety, cultural safety, trauma-informed practice, and inclusion
- Mechanisms to respond to concerns about a person's suitability or performance in relation to child safety

Volunteers and Contractors

All volunteers and contractors who work with children are subject to the same recruitment, screening, induction, and supervision requirements as staff. BAA ensures that **third-party providers and contractors are aware of, and comply with, the organisation's Safeguarding Children and Young People Policy and Code of Conduct**.

Continuous Improvement

BAA regularly reviews recruitment, induction, and supervision processes to ensure they:

- Support the identification and appointment of suitable people to work with children
- Strengthen the organisation's culture of child safety and wellbeing
- Respond to emerging risks, legislation, and best practice standards

3.7 Complaints and Reporting (Standard 7)

BAA is committed to providing a **child-focused, culturally safe, accessible, and transparent** approach to complaints. Children, families, staff, volunteers, contractors, and community members are encouraged to speak up about concerns or breaches without fear of negative consequences.

How to Make a Complaint

Concerns or complaints can be raised at any time through the following BAA contacts:

Safeguarding Lead: Jenna Emmanouel, barca@newstartau.com.au

Concerns or complaints can be made via:

- speaking to any staff member or manager
- online complaint form which can be anonymous
- through a trusted support person

Complaints may relate to:

- child abuse or harm by an adult or another child
- breaches of the Code of Conduct



- unsafe behaviour, environments, or practices
- concerns about how a previous complaint was handled

How BAA Responds to Complaints

BAA will:

- **take all concerns seriously**, whether raised by a child or adult
- **act immediately to protect any child at risk**, including implementing interim safety measures
- **respond in a respectful, culturally safe, child-focused, and timely way**
- **inform families where appropriate**, while upholding privacy, confidentiality, and legal obligations
- **document all decisions, actions, and outcomes**, and keep records secure in accordance with legislation and organisational requirements
- **report to external authorities** in the **relevant state or territory** where the child or incident is located, including:
 - **State or Territory Police**
 - **State or Territory Child Protection agencies**
 - **State or Territory child safety oversight or regulatory bodies** (including reportable conduct scheme bodies where applicable)
- **comply with mandatory reporting laws** and all other legal obligations across Australia

Support for Children and Families

Children and families will be supported through the complaint process, including with:

- cultural safety supports
- communication assistance
- appropriate information and updates
- access to advocates or support persons

Detailed Complaints Procedures

For full information on how complaints are managed and investigated, refer to BAA's Safeguarding Children and Young People **Complaints Handling Policy**, which provides clear steps, responsibilities, and reporting obligations.

3.8 Child Safe Physical and Online Environments (Standard 8)

BAA is committed to creating and maintaining physical, social, cultural, and online environments that protect children and young people from abuse, exploitation, and harm. Our environments whether in-person or digital are designed, monitored, and continually improved to reduce risks, promote participation, and ensure the safety and wellbeing of every child.

This standard applies to all programs, activities, communication channels, spaces, and interactions associated with BAA.

Identifying Indicators of Child Abuse and Harm

BAA ensures that staff, volunteers, contractors, and leaders understand and can identify signs that a child or young person may be at risk of harm, including harm caused by other children.

BAA provides guidance and training to help adults recognise indicators of:

- **Physical abuse** – unexplained injuries, frequent bruising, inconsistent explanations
- Sexual abuse and exploitation – sexualised behaviour or knowledge inappropriate for age, distress, withdrawal, online grooming indicators



- **Emotional abuse** – persistent fearfulness, extreme behaviours, exposure to coercive control
- **Neglect** – ongoing lack of supervision, food, hygiene, medical care, or appropriate shelter
- **Peer-to-peer or child-to-child harm** – bullying, coercion, violence, harmful sexual behaviour, or online harassment

Staff and volunteers are required to stay alert to changes in behaviour, physical signs, and patterns of concern across physical and online environments.

Responding to Child Safety Concerns and Reporting Requirements

BAA ensures that all concerns regarding child safety are responded to promptly, consistently, and in accordance with legal and organisational obligations.

All staff, volunteers, and contractors must follow BAA's reporting procedures, which include:

- Reporting all concerns immediately to the BAA Safeguarding Lead or designated leader
- Calling emergency services if a child is in immediate danger
- Completing the BAA Child Safety Incident Report Form with factual, objective details
- Meeting all legislative reporting obligations to child protection authorities, police, or other regulatory bodies
- Managing confidentiality appropriately and sharing information only with authorised personnel
- Notifying families and carers unless this is likely to place a child at further risk or contradicts advice from statutory authorities

BAA ensures that safety planning is implemented where required, including adjusting supervision, activities, or environments to prevent further harm.

Supporting a Person Disclosing Harm to a Child

BAA is committed to ensuring that disclosures of harm, whether by a child, young person, or another person are handled with sensitivity, care, and professionalism.

Staff and volunteers are expected to:

- Listen calmly without interrupting or questioning
- Reassure the child that they have been heard and have done the right thing by speaking up
- Avoid making promises they cannot keep (e.g., absolute confidentiality)
- Record the disclosure accurately using the child's own words
- Report the disclosure immediately through BAA's internal and external reporting processes
- Provide a safe, supportive environment and ensure the child's immediate needs are met
- Investigations are the responsibility of child protection or police, not BAA staff.

Creating Culturally Safe Environments

BAA recognises the importance of culturally safe environments where children and young people feel respected, valued, and able to express their identity.

BAA is committed to:

- Supporting the cultural rights, identities, and connections of Aboriginal and Torres Strait Islander children
- Ensuring programs, communication, and decision-making are culturally respectful and inclusive
- Addressing racism, discrimination, and cultural bias in all forms



- Providing culturally appropriate engagement with families and communities
- Ensuring children from culturally and linguistically diverse backgrounds feel welcome, represented, and understood
- Providing interpreters and culturally informed support where required

All staff and volunteers participate in training on cultural safety and inclusive practice.

Child Safe Physical Environments

BAA designs and manages physical environments to minimise opportunities for harm and promote visibility, supervision, and accessibility. This includes:

- Maintaining open, observable spaces and avoiding unnecessary closed or isolated environments
- Ensuring appropriate supervision ratios tailored to activities and age groups
- Avoiding unsupervised one-on-one interactions unless unavoidable, authorised, and documented
- Conducting risk assessments for all programs, excursions, transport arrangements, and higher-risk activities
- Managing and monitoring visitor access, ensuring only authorised adults have contact with children
- Ensuring facilities, equipment, and activities are safe and age-appropriate

Child Safe Online Environments

BAA ensures that digital communication and online interactions are safe, transparent, and appropriate. All online engagement follows BAA's safeguarding expectations by:

- Requiring staff and volunteers to use only approved BAA platforms and accounts
- Prohibiting private, unmonitored, or personal communication with children
- Monitoring official digital platforms and social media for inappropriate content or behaviour
- Protecting children's personal information and complying with privacy laws
- Using images, videos, or identifying information only with informed consent
- Educating children, families, and staff about online safety, cyberbullying, and digital risks

Continuous Review and Improvement

BAA regularly reviews the safety of its physical and online environments to ensure they:

- Remain safe, inclusive, and developmentally appropriate
- Reflect current legislation, best practice, and emerging risks
- Incorporate feedback from children, families, staff, and communities
- Support the ongoing improvement of safeguarding processes

BAA is committed to strengthening child safety and wellbeing through continuous monitoring, reflection, and improvement.

3.9 Ongoing Risk Management for Child Safety (Standard 9)

BAA is committed to proactively identifying, assessing, and managing risks to children and young people across all physical, online, social, and operational environments. Effective risk management is essential for preventing child abuse and harm and is embedded across all BAA programs, activities, and services.

This standard ensures that risks are systematically identified, addressed, monitored, and reviewed, and that safeguarding practices remain responsive to emerging challenges and environments.



Risk Identification and Assessment

BAA conducts regular and comprehensive risk assessments to identify potential risks of child abuse and harm across all environments connected with the organisation.

This includes:

- Assessing risks in physical environments such as activity spaces, changing areas, transport arrangements, excursions, and programs
- Assessing risks in online environments including digital communication, social media, virtual programs, storage of personal information, and child online interactions
- Considering risks associated with child-to-child interactions, staff behaviour, environmental design, and higher-risk activities
- Identifying organisational, cultural, operational, and contextual factors that may increase vulnerability for specific children or groups
- Reviewing risks whenever programs change, new activities are introduced, or incidents occur

Risk assessments are documented, reviewed regularly, and shared with relevant staff to ensure risks are clearly understood and appropriately managed.

Risk Management Plans

BAA develops and maintains risk management plans that clearly outline the strategies and controls used to prevent or reduce identified risks of child abuse and harm.

These plans:

- List each identified risk, its likelihood and potential impact
- Describe the control measures implemented to eliminate or minimise the risk
- Clearly outline staff responsibilities for monitoring and managing specific risks
- Identify supervision requirements, environmental changes, or additional safeguards needed
- Include plans for higher-risk settings such as overnight activities, one-to-one interactions, transport, complex needs support, and digital engagement
- Are reviewed and updated regularly to ensure they remain effective and responsive to emerging risks

Risk management plans are integrated into day-to-day practice and guide decision-making across every BAA program.

Guidance Through the Code of Conduct and Policies

BAA's **Safeguarding Children and Young People Code of Conduct** and **Safeguarding Children and Young People Policy** outline clear expectations for staff, volunteers, contractors, and leaders about how to keep children safe across both physical and online environments.

These documents:

- Specify professional behaviour, boundaries, communication rules, and supervision expectations
- Provide guidance on preventing, identifying, and responding to risk in everyday interactions
- Address higher-risk activities, including transport, physical contact, toileting, personal care, one-to-one interactions, overnight stays, and digital engagement
- Define prohibited behaviours and unacceptable risk-taking



- Clarify expectations for online communication, video conferencing, social media, and the protection of children's personal information
- Reinforce the requirement for all adults to take appropriate action when risk is identified

All personnel are required to comply with these documents and are supported through regular communication, training, and supervision.

Procurement and Engagement of Third-Party Contractors

BAA ensures that third-party contractors, service providers, and external organisations engaged to deliver services on behalf of BAA operate in alignment with BAA's commitment to child safety.

Procurement and engagement processes require:

- Contractors to comply with BAA's Safeguarding Children and Young People Policy and Code of Conduct
- Verification that contractors have appropriate Working with Children Checks, registrations, or equivalent screening
- Clear contractual clauses outlining child safety responsibilities, behaviour expectations, supervision requirements, and reporting obligations
- Assurance that any subcontractors also meet BAA's child safety requirements
- Monitoring of contractor performance to ensure ongoing compliance
- Immediate action if a contractor fails to meet child safety expectations

BAA will not engage contractors who cannot demonstrate a commitment to keeping children safe.

Continuous Review and Improvement

BAA regularly evaluates risk management systems to ensure they:

- Effectively prevent and reduce risks of child abuse and harm
- Reflect current best practice, legislation, and emerging risks
- Incorporate feedback from children, families, staff, and community stakeholders
- Support a strong, proactive culture of safety and risk awareness

Through continuous evaluation and improvement, BAA ensures that risk management remains an active and essential element of safeguarding children and young people.

3.10 Reviewing and Improving Child Safety Policies and Practices (Standard 10)

BAA is committed to continually strengthening its safeguarding culture through regular review, evaluation, and improvement of all child safety and wellbeing policies, procedures, and practices. Ongoing monitoring ensures that our safeguarding framework remains effective, compliant with legislative requirements, and responsive to emerging risks, feedback, and evidence.

Regular Review of Policies and Procedures

All BAA policies, procedures, guidelines, and related safeguarding documents include a clearly stated review date and review cycle.

To ensure relevance, clarity, and effectiveness:

- Every child safety-related document states its next scheduled review date
- Reviews occur at least every two years, or sooner if legislation, organisational needs, or incidents require it
- Policies are updated to reflect best practice, current evidence, and lessons learned from reviews, audits, and evaluations



- Staff, volunteers, and contractors are notified of updates and provided with training or guidance when changes affect their responsibilities
- Previous versions are archived to maintain clear document history and accountability

This systematic approach ensures BAA's safeguarding framework remains current and effective.

Monitoring, Review, and Evaluation Processes

BAA regularly monitors and evaluates the effectiveness of child safety practices across all programs and environments.

This includes:

- Assessing how well policies, procedures, and training are understood and implemented
- Identifying areas of strength and opportunities for improvement
- Reviewing compliance with the Code of Conduct and safeguarding requirements
- Collecting feedback from children, families, staff, volunteers, and communities
- Analysing incident reports, complaints, and near misses to identify systemic issues
- Reviewing risks, controls, and practices following any safety-related incident or concern

Evaluation activities are conducted with transparency and a continuous improvement mindset.

Child Safety Review Reports and Documentation

BAA documents the outcomes of all child safety and wellbeing reviews, evaluations, and audits.

Reports:

- Summarise the findings, strengths, and areas requiring improvement
- Outline the actions taken or planned to address identified gaps
- Identify changes required to policies, procedures, training, or risk management
- Are stored securely and retained according to record-keeping requirements
- Are shared with relevant leaders, staff, and stakeholders to promote accountability

Where appropriate, review findings inform policy updates, training content, planning, and operational decisions.

Continuous Improvement

BAA is committed to learning from experience, feedback, and evidence to enhance child safety outcomes.

Continuous improvement practices include:

- Updating policies and procedures based on review findings
- Strengthening supervision, training, and communication
- Adjusting risk management strategies as new risks emerge
- Embedding feedback and insights into organisational planning and culture
- Ensuring that improvements are implemented, monitored, and evaluated

By consistently reviewing and improving safeguarding processes, BAA maintains a strong and proactive child safety culture that adapts to the needs of children, families, and communities.



3.11 Policies and Procedures that Support Child Safety and Wellbeing (Standard 11)

BAA maintains a comprehensive suite of policies and procedures that collectively uphold the safety and wellbeing of children and young people. These documents outline the organisation's expectations, responsibilities, behavioural requirements, and safeguarding practices. Standard 11 ensures that all organisational policies actively support the Child Safe Standards and operate together to create a consistent, transparent, and robust safeguarding framework.

Safeguarding Children and Young People Policy

BAA's **Safeguarding Children and Young People Policy** outlines the organisation's overarching commitment to child safety and establishes the expectations, principles, and practices that guide all work involving children and young people.

The policy:

- Sets out how BAA meets each Child Safe Standard
- Describes the organisation's child-centred, culturally safe approach
- Outlines responsibilities of all staff, volunteers, leaders, and contractors
- Defines key safeguarding practices including supervision, communication, incident response, and risk management
- Affirms children's rights to safety, participation, and inclusion
- Details how BAA ensures cultural safety for Aboriginal and Torres Strait Islander children and children from diverse backgrounds

This policy forms the foundation of all safeguarding documents, ensuring consistency and alignment across the organisation.

Safeguarding Children and Young People Code of Conduct

BAA's Safeguarding Children and Young People Code of Conduct outlines the behavioural expectations, professional boundaries, and responsibilities of staff, volunteers, leaders, and contractors.

The Code of Conduct:

- Clearly describes acceptable and unacceptable behaviour
- Sets expectations for safe physical and online interactions with children
- Defines personal and professional boundaries and prohibited conduct
- Requires adults to act ethically, respectfully, and with the best interests of children at all times
- Includes obligations to report concerns, disclosures, or breaches of the Code immediately
- Applies to all environments and activities connected with BAA

All personnel must read, understand, and sign the Code of Conduct as a condition of engagement.

Risk Assessment and Management Plans

BAA's risk management framework identifies, assesses, and manages risks of child abuse and harm across physical, online, and program environments.

BAA's risk management documents:

- Outline risks associated with organisational activities and contexts
- Detail controls and actions to prevent or reduce identified risks
- Address higher-risk activities such as transport, one-to-one interactions, personal care, digital engagement, and off-site programs



- Assign responsibilities for monitoring risks and implementing controls
- Are reviewed regularly to ensure they remain effective and responsive

Risk assessments and management plans work alongside all other safeguarding documents to ensure a comprehensive, preventative approach.

Complaint Handling Policy and Reporting Procedures

BAA's complaint handling system provides clear, child-friendly and culturally safe processes for responding to concerns, allegations, or complaints of child abuse or harm.

The policy and procedures:

- Set out internal and external reporting requirements
- Define mandatory reporting obligations to child protection, police, and regulatory authorities
- Provide clear steps for responding to complaints and disclosures
- Describe timeframes, documentation requirements, and communication responsibilities
- Ensure procedural fairness and a trauma-informed approach for all children and families
- Include mechanisms for children and young people to raise concerns safely
- Outline protections against victimisation or adverse consequences for making a complaint

These processes ensure transparency, accountability, and compliance with legal obligations.

Child-Safe Recruitment and Screening Policy

BAA's Child-Safe Recruitment and Screening Policy ensures that child safety is embedded in every stage of engaging staff, volunteers, contractors, and third-party providers.

This policy outlines the organisation's requirements for assessing suitability, ensuring safe practice, and maintaining ongoing compliance with child safety expectations.

The Child-Safe Recruitment and Screening Policy:

- Ensures rigorous screening processes, including Working with Children Checks, criminal history checks, and reference checks
- Requires child-safe position descriptions and job advertisements that clearly communicate child safety responsibilities
- Includes child-focused interview questions and structured suitability assessments
- Mandates induction, training, and ongoing supervision in child safety and wellbeing
- Outlines procedures for managing performance and responding to concerns about a person's suitability
- Applies equally to employees, volunteers, contractors, and third-party service providers

This policy helps ensure that only suitable, capable, and child-safe adults are engaged to work with or around children across all BAA environments and activities.

Procurement Policy and Engagement of Third Parties

BAA's Procurement Policy ensures that any third-party contractor, service provider, or organisation engaged to deliver services or facilities meets BAA's child safety standards.

Procurement procedures:

- Require compliance with BAA's Safeguarding Children and Young People Policy and Code of Conduct



- Require contractors to demonstrate child-safe policies, practices, and screening procedures
- Include contractual obligations for child safety, supervision, and reporting responsibilities
- Ensure subcontractors also comply with BAA's requirements
- Allow BAA to cease engagement if child safety expectations are not met

These safeguards protect children during activities delivered by external providers or in external facilities.

Continuous Improvement and Alignment

BAA regularly reviews its policies and procedures to ensure they:

- Align with the Child Safe Standards and relevant legislation
- Reflect current best practice and emerging risks
- Support a consistent, organisation-wide safeguarding approach
- Promote transparency, accountability, and a strong culture of child safety

This integrated policy framework ensures that child safety remains embedded across all aspects of BAA's work.

4. Document Control

Version	Date Approved	Approved By	Document Owner	Next Review Date	Change Summary
V1.0	2 February 2026	Director	Safeguarding Lead	2 February 2027	Initial release