

Child Safety and Wellbeing Framework

JCP Youth Ltd Child Safety and Wellbeing Framework (**Framework**)

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Statement of Commitment to Child Safety and Wellbeing

JCP Youth Ltd (JCP Youth) acknowledges that the safety, wellbeing and best interests of children and young people are paramount.

- 1.1. JCP Youth is committed to providing children and young people with an environment which promotes and protects their health, safety and wellbeing at all times.
- 1.2. JCP Youth supports, values and respects all children and young people, and is committed to their safety, participation and empowerment.
- 1.3. JCP Youth is committed to providing a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal and Torres Strait Islander children and young people are respected and valued.
- 1.4. JCP Youth will treat all children and young people with dignity, respect and integrity and will provide a safe and inclusive environment for the diverse needs of all children and young people including children and young people with disability, those from culturally and linguistically diverse backgrounds, children and young people who are unable to live at home, children and young people in the youth justice system, and children and young people who identify as lesbian, gay, bisexual, transgender and intersex. Furthermore, the right to protection is irrespective of age, gender identity, sexual orientation, ethnicity, religious beliefs, ability or family background.
- 1.5. JCP Youth is committed to providing welcoming, safe and accessible environments where children and young people feel valued, empowered and consulted about the decisions that affect their lives. Decision making is informed by our commitment to remove or reduce the risk of child abuse and harm.
- 1.6. JCP Youth has zero tolerance for all forms of child abuse and harm against children and young people, and all allegations will be treated seriously in accordance with our policies and procedures. We will champion a culture of safety by engaging suitable staff to work with children and young people. JCP Youth will utilise our specific policies, procedures and practices to support our children and young people, families and the community.
- 1.7. JCP Youth welcomes and encourages children, young people, parents, carers, families and the community to be engaged in facilitating a child safe environment and to provide feedback and build the capacity of children and young people to understand their rights and responsibilities.

Purpose of the Framework

The JCP Youth Child Safety and Wellbeing Framework outlines JCP Youth's approach to safeguarding children and young people.

The Framework aims to:

- 1.1. Ensure JCP Youth meets its legal and moral responsibilities for the safety, protection and wellbeing of all children and young people.
- 1.2. Comply with relevant legislation including the Child and Youth Safe Standards (**CYSS**).
- 1.3. Create and encourage a child safe organisational culture which is fostered at all levels of the organisation.
- 1.4. Promote a child safe environment and culture where children and young people are safe and feel safe.
- 1.5. Protect children and young people under JCP Youth's care, authority or supervision from abuse and harm by having practices in place to prevent, remove or reduce potential risks of child abuse and harm in all JCP Youth Environments.
- 1.6. Set clear expectations about behaviour towards and in the presence of children and young people.
- 1.7. Set standards and behaviours that are acceptable and unacceptable towards and in the presence of children and young people, taking into account the diverse needs of children and young people, the different environments in which JCP Youth operates, and the various ways our people interact with children and young people.
- 1.8. Assist JCP Youth staff to be aware of how their behaviour and the behaviour of other adults in our organisation and the broader community can affect the children and young people we work with.
- 1.9. Assist JCP Youth staff to identify and raise behavioural and/or conduct issues with confidence.
- 1.10. Address allegations and suspicions of child abuse and harm when they do occur in a timely and appropriate manner, and uphold consistency, transparency and accountability in JCP Youth's response to and management of child safety concerns.
- 1.11. Provide assurance that all suspected and actual reports of child abuse and harm will be reported and properly investigated.
- 1.12. Ensure JCP Youth staff, as defined by this Framework, are aware of their responsibilities to identify, prevent and report child abuse and harm to children and young people within all JCP Youth Environments and within the broader community.
- 1.13. Provide a clear statement to JCP Youth staff forbidding child abuse and harm.
- 1.14. Meet JCP Youth's legislative responsibilities and achieve its organisational goals.
- 1.15. Foster a culture of openness and transparency where all persons, including children and young people, feel they can safely disclose concerns about their safety or wellbeing.
- 1.16. Outline the mandatory training guidelines for all JCP Youth staff.
- 1.17. Create a culture which encourages genuine engagement and empowerment of children and young people, and consults with children and young people, their families, carers and the community.

Scope

- 1.1. This Framework applies to all JCP Youth staff, as defined by this Framework, including all people who conduct work for, or are connected to, JCP Youth in a paid or unpaid capacity.
- 1.2. This Framework extends to all JCP Youth Environments and all interactions with children and young people, including but not limited to:
 - a) Physical and face to face contact;
 - b) Contact by post or other written communication;
 - c) Contact by telephone or other oral communication; and
 - d) Contact by email or other electronic communication including online messenger services, social media, online meetings, seminars or services, online surveys and engagement in the community.

Child Safety and Wellbeing Policy

1. Introduction

- 1.1. JCP Youth has a moral and legal responsibility to promote and protect the health, safety and wellbeing of all children and young people. We are committed to providing an environment where children and young people are respected, empowered, and feel safe. We have zero tolerance for child abuse and harm.
- 1.2. If any person believes a child or young person is at immediate risk of child abuse or harm, telephone 000.

2. Codes of Conduct

- 2.1. JCP Youth has the following Child Safety Codes of Conduct (**Codes**) which must be read in accordance with this Policy:
 - a) [Child Safety Code of Conduct](#)
 - b) Staff Code of Conduct
- 2.2. The Codes apply and provide guidance to all JCP Youth staff in the context of their involvement with children and young people in their roles.
- 2.3. The Codes help to create a positive, respectful and safe environment by setting expectations in relation to the appropriate behaviour of JCP Youth staff in their interactions with children and young people engaged in JCP Youth programs, activities and events. Before working with children and young people, JCP Youth staff must read, understand and agree to comply with the Codes as part of JCP Youth's child safety induction and training.
- 2.4. All third-party contractors are expected to abide by the Codes, and where they are engaging with children and young people, will have to sign an agreement to comply with the Codes prior to delivering any services.
- 2.5. Breaches of the Codes will be dealt with in accordance with this Policy and may result in disciplinary action including termination of a person's involvement with the organisation.
- 2.6. The Codes are publicly available on the JCP Youth website at <https://jcpyouth.com.au/contact/>
- 2.7. JCP Youth will enforce the Codes.
- 2.8. Following any non-compliance or allegation of non-compliance with the Codes, JCP Youth will instigate a review that may result in a restriction of duties, suspension or termination of employment or other corrective action.

3. Child Safety and Wellbeing Principles

Children's Empowerment and Participation

- 3.1. JCP Youth is a child safe organisation and actively seeks to include children and young people's views and ideas in planning and decision making.
- 3.2. JCP Youth encourages children and young people to participate meaningfully and respects children and young people's rights to privacy, access to information, social connections and learning opportunities.

- 3.3. JCP Youth does not tolerate bullying or abusive behaviour between children and young people and will take action if this occurs.
- 3.4. JCP Youth respects the rights of children and young people and provides them with information about their rights including the right to feel safe and be safe and what they can do if they feel unsafe.
- 3.5. JCP Youth values the voices of children and young people and will act on safety concerns raised by children, their families or the community.
- 3.6. JCP Youth will facilitate a culture that facilitates meaningful and purposeful participation and are responsive to the contributions of children and young people.
- 3.7. JCP Youth does not tolerate racism or discrimination and will act to ensure that children and young people feel safe to participate.
- 3.8. JCP Youth supports children and young people's participation in the following ways:
 - a) Regular discussions with children and young people, including child-led conversations on what makes them feel safe and unsafe.
 - b) Consultation with children and young people about any proposed significant changes to the physical or online environment, policies, procedures, programs or staffing. Children and young people's views are collected by staff, provided to management and considered in the decision-making process.
 - c) Information provided to children, young people and families about JCP Youth operations, staffing and programs are made suitable for different age groups and diversity of the children.

Families and Communities

- 3.9. JCP Youth recognises the important role of families and involves parents and carers when making decisions affecting their child and young people.
- 3.10. Parents, guardians, families and communities are encouraged to provide feedback and raise concerns at any time through communication with staff or contact JCP Youth at office@jcpyouth.com.au
- 3.11. JCP Youth provides information to families and the community about our child safe policies and engages in consultation practices including through:
 - a) Publishing the Framework on our website.
 - b) Including information about our child safety approach, our operations and Board and management structure in our induction processes.
 - c) Including articles and information on child safety and wellbeing, and reminders about our policies and procedures in our newsletter.
 - d) Ongoing discussions and contact with JCP Youth staff throughout the duration of the program.

Creating Culturally Safe Environments for all Aboriginal and Torres Strait Islander Children, Young People and their Families

- 3.12. JCP Youth is committed to creating environments where Aboriginal culture is celebrated and Aboriginal and Torres Strait Islander children, families and community members are welcomed, consulted and included.
- 3.13. Strategies to embed cultural safety for Aboriginal children and young people in JCP Youth's policies and practices include:

- a) An Acknowledgement of Country at all presentations, performances or speaking arrangements.
- b) Consulting with families and members of the Aboriginal community to identify opportunities to promote Aboriginal culture and practices in JCP Youth programs.
- c) Providing opportunities for children and young people to share their cultural identity and express their culture during activities and services.
- d) Supporting children and young people who wish to explore their culture, including consulting with their family and relevant Aboriginal organisations.
- e) Celebrating NAIDOC Week and acknowledging significant events including National Sorry Day and National Reconciliation Week.
- f) Seeking feedback from Aboriginal children, young people, families and communities on their experience participating in JCP Youth programs, particularly in relation to how safe they feel expressing their identity including their culture.
- g) JCP Youth does not tolerate bullying, abusive or racist behaviour towards Aboriginal children, young people, their families or the community and will take action if this occurs.

Valuing Diversity

- 3.14. JCP Youth is committed to ensuring JCP Youth is an inclusive, welcoming and supportive environment for all.
- 3.15. JCP Youth is a community enriched by people from different cultures and backgrounds, living together in harmony and participating in community life.
- 3.16. JCP Youth seeks to ensure that all children and young people, their families and the community from culturally diverse backgrounds feel included and have equal access to services and facilities including by:
 - a) Translating JCP Youth's policies and procedures into other languages to ensure they are accessible by all cultural backgrounds.
 - b) Translating information about JCP Youth services into community languages and distributing it using culturally appropriate methods.
 - c) Providing interpreters at JCP Youth meetings, events and consultations.
 - d) Holding annual events and festivals to celebrate cultural diversity and to promote community harmony.
 - e) Consulting with culturally and linguistically diverse residents when planning and developing policies, services and programs.
 - f) Delivering cross-cultural awareness training for staff including information about how to effectively use interpreters and translations services.

Empowering Children and Young People About Their Rights

- 3.17. JCP Youth will take steps to ensure that children and young people are aware of their rights and know how to seek help when it is needed.
- 3.18. JCP Youth will takes steps to ensure that all children and young people feel confident in raising a complaint or concern.
- 3.19. JCP Youth recognises the importance of friendships and will support children and young people to develop social connections and empower children to communicate with adults regarding the safety and wellbeing of their friends and peers.

4. Responsibilities

The safety of children and young people is **everyone's** responsibility.

JCP Youth Staff

4.1. All JCP Youth staff:

- a) Have a moral, legal and ethical responsibility to care for, and promote the wellbeing of children and young people, and protect them from abuse and harm.
- b) Are responsible for identifying child abuse and harm and the risk of child abuse and harm, and taking steps to prevent, mitigate and eliminate child abuse and harm.
- c) Must treat all allegations and suspicions of child abuse seriously and respond consistently with the Framework.
- d) Must promote child safety at all times and provide a safe environment for all children and young people.
- e) Must provide an environment of cultural safety for Aboriginal and Torres Strait Islander children and young people, encourage them to express their culture and provide an environment free from racism and discrimination.
- f) Must pay particular attention to children and young people with disability, those 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, and ensure that their needs are met, and they are supported and responded to.
- g) Must identify and report child abuse and harm to the relevant authorities in accordance with the Procedure and must not attempt to establish proof or investigate the matter.
- h) Must telephone 000 if they believe a child or young person is at immediate risk of child abuse or harm.

4.2. All JCP Youth staff are required to:

- a) Read and comply with the Framework.
- b) Take all reasonable steps to maintain an environment that prevents and eliminates child abuse and harm.
- c) Respond in a child-focused manner to all disclosures, allegations and risks of child abuse and harm, with sensitivity and professionalism.
- d) Participate in child safety induction and training as directed by JCP Youth and request further assistance if further training is required to understand their obligations and responsibilities in relation to child safety and under this Policy.
- e) Report any concerns about actual, suspected or risk of child abuse or harm as soon as possible to the Chief Operating Officer (**COO**).
- f) Report any breach or suspected breach of the Framework as soon as possible to the COO.

JCP Youth

4.3. JCP Youth will ensure, as far as possible, that JCP Youth staff are aware of:

- a) Their responsibilities to create and maintain a child safe environment for all children and young people, including a culturally safe environment for Aboriginal and Torres Strait Islander children and young people.
- b) Their obligations under the Framework.
- c) The appropriate standard of conduct and behaviour that JCP Youth requires.

- d) JCP Youth's commitment to empower children and young people about their rights including the right to feel safe, be informed and participate in decisions affecting them.

JCP Youth Board

- 4.4. The JCP Youth Board has ultimate responsibility for complying with the CYSS, and must:
- a) Model and champion a child safe culture and make a public commitment to child safety.
 - b) Prevent, identify and mitigate child safety risks, including the risk of child abuse or harm within all JCP Youth Environments, including the physical and online environment.
 - c) Implement appropriate policies, procedures and codes of conduct in relation to child safety, including ensuring JCP Youth staff are equipped with knowledge, skills and awareness through ongoing education and training, and ensuring staff are suitable to work with children and young people.
 - d) Ensure JCP Youth staff are aware of the Framework and their overall child safety obligations, including the obligation to report suspected child abuse and harm.
 - e) Ensure appropriate insurance arrangements are in place.
 - f) Ensure appropriate and effective control systems are in place, including processes to respond to complaints and concerns, and conducting regular reviews.
 - g) Empower children, young people, families and communities with information about their rights and protections and invite them to participate in decisions affecting them to create a child safe culture.
 - h) Consult with children, young people, families and communities in relation to child safety and value their contribution to creating a child safe environment.
 - i) Monitor staff compliance with the Framework.
 - j) Ensure that the Framework is reviewed and updated annually and after every child safety incident or investigation.
 - k) Provide guidance on the development of media responses.
 - l) Act as subject matter experts in the development of proactive media releases.

The Chief Operating Officer

- 4.5. The COO of JCP Youth is responsible for:
- a) Modelling and promoting a culture of child safety at all times, supporting staff to understand child safety at all times, facilitating the communication of information in relation to child safety across JCP Youth.
 - b) Preventing, identifying and mitigating child safety risks, including the risk of child abuse or harm, within all JCP Youth Environments, and engaging in and/or reviewing risk management process to promote the safe participation of children and young people in all JCP Youth Environments.
 - c) Recording risks to child safety in the JCP Youth risk register and specifying the actions JCP Youth will take to reduce or remove the risks when a JCP Youth staff member notifies them of an identified risk.
 - d) Acting as a first point of contact in relation to child safety concerns, reports or allegations and comply with reporting obligations in relation to actual, suspected or risks of child abuse or harm and having systems in place to enable anyone to notify a reportable allegation to JCP Youth or the Office of the Independent Regulator (**OIR**), including allegations made against the CEO, in accordance with the Reportable Conduct Scheme (**Scheme**).

- e) Making reports, responding to, managing and overseeing the investigation of complaints and disclosures under this Policy and in accordance with the Scheme.
- f) Making reports and adhering to legislative obligations in relation to reporting, including under the Scheme.
- g) Maintaining adequate records of all complaints, decisions and actions taken in relation to any child safety complaint or disclosure under this Policy.
- h) Having investigation processes clearly defined and overseeing the response and investigation of reports of child abuse and harm, including under the Scheme.
- i) Ensuring JCP Youth staff are aware of the Framework and their overall child safety obligations, including the obligation to report suspected child abuse or harm.
- j) Ensuring appropriate policies and procedures are in place, including effective internal control systems to identify child abuse and harm and risks of significant harm to children.
- k) Providing accurate and timely reports to the JCP Youth Board as requested or required.
- l) Providing support to JCP Youth staff to undertake their child safety obligations and being available to listen, discuss and clarify issues confronting JCP Youth staff, children and young people, families and the community in relation to child abuse or risk of child abuse and harm.
- m) Deliver and/or facilitate child safety training to staff.
- n) Involving children and young people, and their families, in decision making and planning to promote child safety.
- o) Monitoring staff compliance with the Framework.
- p) Ensuring that the Framework is reviewed and updated annually and after every child safety incident or investigation.

Human Resources and Management (HR)

4.6. HR is responsible for:

- a) Championing and leading a child safeguarding culture across the organisation and providing human resources expertise and guidance in driving child safety compliance across JCP Youth.
- b) Not allowing JCP Youth staff to work within JCP Youth without a valid Working with Vulnerable People Registration (**WVPR**), including when a WVPR has expired or a negative notice is received.
- c) Collecting, documenting and storing information from applications and their referees to assess their suitability to engage in a regulated activity with children and young people within JCP Youth.
- d) Ensuring that all contractors working with children hold a valid WVPR.

District Leaders

4.7. All District Leaders are responsible for:

- a) Promoting and modelling child safety at all times.
- b) Assessing the risk to child safety, including the risk of child abuse or harm, within their area of control and taking steps to reduce or eliminate any risk to the greatest extent possible.
- c) Educating and supporting JCP Youth staff in their teams about identifying and preventing child abuse or harm or the risk of child abuse or harm.
- d) Completing the Risk Register and specify any actions JCP Youth will take to reduce or remove the risks (i.e. risk controls) when they are notified of an identified risk.

- e) Facilitating the reporting of any concerns regarding child safety including reports or disclosures of actual, suspected or risks of child abuse and harm, as soon as possible.
- f) Reporting any incidents or risks in relation to child safety to the CEO as soon as possible.
- g) In circumstances where the child or young person is not in immediate risk, helping JCP Youth staff to understand their reporting obligations and support JCP Youth staff through the process of making a report if required.
- h) Discussing any child safety concerns, incidents, allegations or suspicions of child abuse with the CEO, to understand their reporting obligations.
- i) Supporting JCP Youth staff to discuss their protective concerns with a parent(s), where appropriate, prior to or after making a report, unless they suspect that doing so may place the child or young person at further risk or place the JCP Youth staff or another person at risk.
- j) Contacting relevant authorities to discuss child safety concerns further and/or lodging a formal complaint, where a response or outcome is unsatisfactory.
- k) Offering JCP Youth staff the opportunity to debrief about any child safety incidents, concerns, risks or reporting processes.
- l) Encouraging JCP Youth staff to seek additional support through JCP Youth's Employee Assistance Program and/or through access to clinical supervision, as required.
- m) Initiating a review after a report has been made, or where a JCP Youth staff member has failed to make a report, to determine if there were any practice-related, risk management or systemic issues that need to be addressed.
- n) Referring disputes or differences of professional opinions to HR for further action.
- o) Immediately notifying the Supervisor of their area where the incident involves misconduct or reportable conduct of a JCP Youth staff member.
- p) Not allowing JCP Youth staff to work within JCP Youth without a valid WVPR, including when a WVPR has expired or a negative notice is received.
- q) Collecting, documenting and storing information from applications and their referees to assess their suitability to engage in a regulated activity with children and young people within JCP Youth.
- r) Securely storing all child safety incident reports as directed by the CEO.

5. Recruiting Staff and Volunteers

- 5.1. JCP Youth engages in a range of recruitment strategies to ensure that staff are suitable and supported to work with children and young people.
- 5.2. JCP Youth only recruit staff who are suitable to work and engage with children and young people.
- 5.3. JCP Youth's recruitment strategies include:
 - a) Developing clear position descriptions for jobs, categories of jobs or roles that involve child-related work setting out:
 - i. The job's requirements, duties and responsibilities regarding child safety and wellbeing; and
 - ii. The essential or relevant qualifications, experience and attributes in relation to child safety and wellbeing required for the role.
 - b) Examining written applications and engaging in face-to-face interviews for applicants who will or may work with children and young people.

- c) Engaging in a thorough examination of a person's suitability to work with children and young people prior to inviting them to take a leadership position with children or young people.
- d) Screening all persons that will or could reasonably work with children and young people to verify that they have a valid WVPR before they commence working with children and young people at JCP Youth and keeping records of all relevant information.
- e) Informing all applicants for jobs and volunteer positions that involve work in a regulated activity of JCP Youth's child safety policies and practices, including the Framework.
- f) JCP Youth will make reasonable efforts to gather, verify and record the following information about a person whom it proposes to engage to perform work in a regulated activity:
 - i. WVPR status, or similar check including confirmation that JCP Youth has been registered on the person's WVPR or similar check as employer;
 - ii. Proof of personal identity and any professional or other qualifications;
 - iii. The person's history of work involving children and young people, including any history of complaints, disciplinary action or allegations of reportable conduct made against the person in the course of any employment or voluntary position held by the person; and
 - iv. JCP Youth will not offer any applicant a position at JCP Youth until the applicant provides the required evidence to the Recruitment Team.

6. Working with Vulnerable People Check

- 6.1. The WVPR is a screening process for assessing and re-assessing people who work with or care for vulnerable people, including children and young people, in Tasmania. The WVPR aims to prevent people who may pose a risk to children and young people from working with children and young people.
- 6.2. The Recruitment, Onboarding and Probation Policy under Section 5.13 of JCP Youth's Policies and Procedures document sets out information on how JCP Youth ensures that people who work with children and young people are suitable.
- 6.3. It is a requirement under the *Registration to Work with Vulnerable People Act 2013 (Tas) (Act)* for all JCP Youth staff who are engaged in a regulated activity to obtain a WVPR, if they meet the following conditions:
 - a) They are a person who has contact with a vulnerable person as part of a regulated activity, regardless of whether or not they take part in the regulated activity for a reward, and includes employees, contractors, volunteers, and work experience students;
 - b) They are working at or for one of the services, places or bodies, or in one of the activities listed in the Act (refer to the Definitions Section);
 - c) The contact with the vulnerable person is contact which would be reasonably expected to occur as a normal part of a regulated activity;
 - d) The contact is more than incidental; and
 - e) The contact with the vulnerable person involves physical contact, taking part in a regulated activity in the same place as the vulnerable person, face-to-face or telephone oral communication, or written communication, including digital communication.
 - f) They are not otherwise exempt from needing a WVPR under the Act.

6.4. Exemptions:

- a) A person may be exempt from holding a WVPR under the Act, if the person is:
 - i. Under 16 years of age.
 - ii. An interstate worker and hold a registration in another state.
 - iii. The relative of the vulnerable person.
 - iv. A police officer or correctional officer.
 - v. A student completing work experience or training.
 - vi. Taking part in the same activity as the vulnerable person.
 - vii. Having contact with a vulnerable person through information records.

6.5. JCP Youth will not:

- a) Permit JCP Youth staff who do not hold a current WVPR to be in unsupervised direct contact with children or young people in the course of their work/tasks (whether paid or voluntary) at JCP Youth, or whilst representing JCP Youth.
- b) Engage or continue to engage anyone in a regulated activity who doesn't have a valid WVPR, unless they are exempt under the Act or have lodged an application for a WVPR that's currently being assessed (subject to the below).
- c) Engage or continue to engage anyone who would otherwise be exempt from holding a valid WVPR, if they have received a negative risk assessment, and not subsequently received a WVPR.
- d) Allow people who are charged with, convicted or found guilty of a relevant offence specified in section 24 of the Act to work with or care for children or young people while their application is processed or their WVPR reassessed.
- e) Offer the services of any person who doesn't have a WVPR to another organisation if the work to be undertaken with that organisation is a regulated activity.

7. Supporting Staff and Volunteers

- 7.1. JCP Youth is committed to ensuring that all JCP Youth staff receive training to ensure they understand their responsibilities in relation to child safety and to support their engagement with children and young people.
- 7.2. JCP Youth assists JCP Youth staff to incorporate child safety considerations into decision making, and to promote a safe environment where children and young people are empowered to speak up about issues that affect them.
- 7.3. JCP Youth will ensure all new and existing JCP Youth staff understand the importance of protecting children and young people from abuse and harm. This will be supported through induction, training and professional development and will include:
 - a) Completion of all child safety training as required by the Child Safety Training Plan contained in the Framework, or as otherwise directed by their Supervisor.
 - b) Compulsory completion of a mandatory online child safety module to be undertaken by all JCP Youth staff during induction and on an annual basis. This module will be updated to reflect current practices and be supported by further professional development opportunities.
 - c) Induction and annual refresher training for JCP Youth staff incorporating awareness to build a foundation of understanding and commitment to the safety and wellbeing of children and young people.
 - d) Ongoing supervision by District Leaders who are trained in JCP Youth's policies and procedures.
 - e) Training for JCP Youth staff before engaging with children and young people.

- f) All JCP Youth staff will also be required to review this Policy and have the opportunity to enquire with the CEO should they need further guidance.
- g) Instructing and supporting JCP Youth staff in complying with procedures for responding, suspecting and identifying child abuse and harm or risk of child abuse or harm towards children and young people.

8. Risk Management

- 8.1. JCP Youth recognises the importance of identifying and managing risks of child abuse and harm in all JCP Youth Environments.
- 8.2. JCP Youth has a Risk Management Framework which includes the assessment and mitigation of risks of child abuse and harm in JCP Youth Environments.
- 8.3. JCP Youth understands that there may be a number of risks associated with its services and programs in relation to:
 - a) The supervision of children and young people within JCP Youth Environments.
 - b) Images or videos taken of children and young people within services, programs and activities run by JCP Youth.
 - c) The online environment including outside JCP Youth Environments.
 - d) Overnight activities including camps, programs and activities including excursions.
 - e) The transportation of children and young people to services, activities and excursions.
 - f) The use of toilets and/or bathrooms in all JCP Youth Environments.
 - g) The increased vulnerabilities of children and young people with medical conditions and/or illnesses.
 - h) The physical environment where there is risk to children and young people of physical injury.
 - i) Subcontracting activities.
- 8.4. To prevent, mitigate and/or remove those risks, JCP Youth:
 - a) Requires JCP Youth staff to comply with the Framework.
 - b) Reviews risks, monitors and evaluates the effectiveness of the implementation of its risk controls.
 - c) Provides resources to JCP Youth staff to educate JCP Youth staff on identified risks.
 - d) Makes child safety and wellbeing a part of its overall risk management strategy and approach.
 - e) Requires JCP Youth staff to comply with training, induction and supervision obligations and monitors the continued suitability of JCP Youth staff who engage in child-related work.
 - f) Has human resources policies to assess JCP Youth staff in relation to compliance with their child safe obligations and continued suitability for child-related work.
- 8.5. All identified risks of child abuse and harm are actively reduced by designing and implementing appropriate preventative measures including:
 - a) Risk management plans are documented for all existing and new activities and facilities.
 - b) Staff, volunteers and contractors are made aware of their responsibility for identifying risks of child abuse and their obligation to work with management on reducing those risks.
 - c) Families and children and young people are made aware of how to report on identified risks of child abuse.

- d) Risk management plans are living documents that are updated as required, referred to regularly and reviewed periodically.

9. Breaches

- 9.1. JCP Youth staff must report any breach or suspected breach of the Framework to the District Leader and/or the CEO as soon as possible after becoming aware of the breach or suspected breach.
- 9.2. JCP Youth staff must take immediate steps to ensure the safety and wellbeing of any child or young person who may be at risk as a result of or in relation to the breach.
- 9.3. Suspected breaches of the Framework are treated seriously by JCP Youth and will be investigated (either internally or externally, depending on the severity of the suspected breach) in a manner that affords procedural fairness to the subject of the investigation and complies with the Scheme, if applicable.
- 9.4. JCP Youth will handle the allegations in a confidential manner to the greatest extent possible.
- 9.5. Following an investigation into a suspected breach, any person who is found to have breached the Framework may face disciplinary action (including termination of their engagement with JCP Youth).

10. Investigations

- 10.1. JCP Youth will do all things necessary to assist in any external investigations conducted by an independent Investigator, Police, government department and/or regulator, including complying with the Scheme.
- 10.2. The CEO and/or their delegate, will make every effort to keep child safety investigations confidential.
- 10.3. From time-to-time JCP Youth staff may need to participate in and/or be consulted in conjunction with the investigation.
- 10.4. An investigation conducted by JCP Youth or on behalf of JCP Youth will be conducted in accordance with procedural fairness to protect the integrity of the investigation and the interests of all the parties involved in the investigation.

11. Disciplinary Procedure

- 11.1. JCP Youth staff who intentionally, recklessly or negligently fail to meet their reporting obligations may face disciplinary action.
- 11.2. JCP Youth staff who make a report in good faith will not be held liable and will not face disciplinary action, even if the allegation or suspicion proves to be unfounded on investigation.
- 11.3. Disciplinary measures may result in a range of actions up to and including:
 - a) Training and education;
 - b) Report to the OIR;
 - c) Restricted duties, suspension, or termination of employment;
 - d) Termination of a partnership or contract with a third party provider;
 - e) Other legal action; and/or
 - f) Criminal investigation and prosecution.

12. Reporting and Responding to Child Abuse Allegations or a Risk of Harm

- 12.1. JCP Youth is committed to ensuring that children and young people who access their services and programs are kept safe from harm and the risk of harm.
- 12.2. When JCP Youth suspects that a child or young person has been harmed or is at risk of harm, JCP Youth will respond to that suspicion in an appropriate manner which prioritises the safety of children and young people.
- 12.3. JCP Youth staff are required to follow the Procedure contained within the Framework on page 20.
- 12.4. JCP Youth will comply with all legal reporting obligations including the Scheme, and will provide information to government agencies including Police, and do all things necessary to assist with enquiries, as is required.

13. Child Safety Reporting Procedure

- 13.1. All complaints and child safety concerns will be responded to promptly and thoroughly according to legislation and the Procedure contained within the Framework.

14. Record Keeping

- 14.1. All reports of alleged or risk of abuse or harm, must be recorded in the form of a report which is found on ECINS, listed under the relevant young persons profile.
- 14.2. An Incident Report must record as much information as possible in relation to the report, including but not limited to places, times, dates, names of people, indicators or evidence of harm, contact details of persons involved, age and dates of birth of children involved.
- 14.3. Reports must be securely stored by the JCP Youth staff member in accordance with JCP Youth's Information Management Policy which can be found under Section 11.2 of JCP Youth's Policies and Procedures document.
- 14.4. The CEO is responsible for ensuring adequate records are maintained. The JCP Youth staff member who identified or witnessed the actual or risk of child abuse or harm must complete an ECINS Report as soon as practicable after the incident. If the JCP Youth staff member is unable to complete the Incident Report, the District Leader should complete the Incident Report as soon as practicable after the incident.
- 14.5. The CEO will ensure that the following records are held and maintained indefinitely:
 - a) Allegations, complaints and concerns of a breach of the Framework.
 - b) Complaints, reports and disclosures of actual or suspected child abuse or harm to a child or young person.
 - c) Reports made to external government agencies or regulators including reports to Police or reports made under any applicable Scheme.
 - d) Investigation reports, evidence and records of interview in relation to any investigation under this Policy.
 - e) All decisions and actions taken in relation to any child safety complaint, report of a breach or disclosure received.

15. Informed Consent and Information Sharing

- 15.1. Internal information sharing may be required in order to make well-informed decisions. JCP Youth acknowledges that the safety and wellbeing of children and young people is the paramount consideration when sharing information internally. Prior to sharing information internally, consideration should be given to mitigating risk to children and young people, without comprising a child or young person's right to privacy.
- 15.2. JCP Youth may need to share information about incidents or complaints with external authorities or organisations to comply with legislative requirements or to prioritise safety.
- 15.3. JCP Youth will not disclose an individual's personal information to any external party without their consent unless JCP Youth is required or authorised to do so by law.
- 15.4. In order to achieve the best outcomes for children, young people and families, it will sometimes be necessary for a JCP Youth staff member to share certain information with other professionals. In such cases the JCP Youth staff member should:
 - a) Consult with the District Leader to assess what information can be shared and with whom.
 - b) Obtain informed consent from the child or young person, or their parents/guardians, if appropriate to do so.
 - c) Document the details of the information shared, who the information was shared with, if consent was gained and any other decision making around information sharing.
 - d) Relevant authorities can also contact any person they believe holds information relevant to the protection and development of a child to share information about a child, young person or family without the consent of the child or family.

16. Privacy

- 16.1. JCP Youth will collect, use, disclose and hold personal information in accordance with the *Privacy Act 1988* (Cth) and JCP Youth's Privacy Policy is located under Section 11.1 of JCP Youth's Policies and Procedures document.
- 16.2. Confidentiality and privacy in relation to reports of child abuse and harm will be maintained consistent with JCP Youth's legal obligations, the principles of natural justice and JCP Youth's duty of care to protect children and young people.
- 16.3. In relation to a child or young person's privacy, JCP Youth will consider the best interests of the child or young person. The paramount consideration when considering best interests, is the safety of children and young people. JCP Youth will respect a child or young person's right to privacy, while mitigating risks in the physical and online environment, except when this conflicts with the best interests of the child or young person.
- 16.4. When a report is made in good faith to the Police, a government department or regulator, the disclosure will not be a breach of privacy. The Procedure contained within the Framework sets out reporting requirements.

17. Related Legislation and Policies

There are a range of legislation, codes and JCP Youth documents that inform and support this Policy. These include, but are not limited to:

Legislation	JCP Youth Documents
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• <i>Australian Human Rights Commission Act 1986 (Cth)</i> • <i>Children, Young Persons and their Families Act 1997 (Tas)</i> • <i>Children and Youth Safe Organisations Act 2023 (Tas)</i> • <i>Child and Youth Safe Standards</i> • <i>Criminal Code Act 1924 (Tas)</i> • <i>Registration to Work with Vulnerable People Act 2013 (Tas)</i>	• JCP Youth Policies and Procedures document • JCP Youth Child Safety Code of Conduct • JCP Youth Child Safety Commitment to Child Safety • JCP Youth Child Safety Reporting Procedure
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18. Monitoring, Evaluation and Review

- 18.1. JCP Youth commits to monitoring processes, information sharing and decision making to understand the overall level of success in the Framework's implementation.
- 18.2. The CEO will make changes as needed to respond to information from child safety reviews or investigations.
- 18.3. JCP Youth welcomes feedback from all members of the community including families on how it can improve its risk management approach and better protect the safety of children and young people. Please direct feedback to the CEO or the JCP Youth Board in writing.
- 18.4. A review of the Framework shall be conducted annually, and after every critical child safety and wellbeing incident.
- 18.5. The CEO is authorised to make amendments as needed for administrative or updated information purposes. The CEO may also make amendments to the list of related documents at such times where reference material or guidelines require updating.

Child Safety Reporting Procedure

1. Introduction

- 1.1. JCP Youth is committed to ensuring that children and young people who access JCP Youth's services, events and programs are kept safe from harm and the risk of harm.
- 1.2. The Child Safety Reporting Procedure (**Procedure**) helps to create a safe environment for children and young people by setting a clear process for reporting in accordance with JCP Youth's legal and moral obligations to keep children and young people safe from harm and ensuring that JCP Youth has an effective complaint handling process in accordance with the CYSS.
- 1.3. When JCP Youth suspects that a child or young person has been harmed or is at risk of harm, JCP Youth will handle that suspicion seriously and in a child-focused manner, which prioritises the safety of children and young people.
- 1.4. All JCP Youth staff who believe on reasonable grounds a child or young person is in need of protection from child abuse or harm, must report their concerns to the CEO, in accordance with this Procedure.
- 1.5. All JCP Youth staff must follow the process outlined in the actions below.

2. Critical Actions

JCP Youth staff must follow the following actions when a child or young person is harmed or is at risk of harm or provides a disclosure of harm.

Action 1: Protect the child or young person from immediate danger

- 2.1. If JCP Youth staff believes the child or young person is at immediate risk of abuse, they must notify Tasmania Police immediately by telephoning 000.
- 2.2. The JCP Youth staff member must stay with the child or young person and take all reasonable steps to ensure their immediate safety, if they are reasonably able to do so, including:
 - a) Separating the alleged victims and others involved.
 - b) Administering first aid.
 - c) Calling 000 for urgent medical assistance to address immediate health and safety concerns.
 - d) Reporting to the CEO.
 - e) Completing an Incident Report Form either digitally or in paper format.
 - f) Document the incident on the Empowering Communities through Integrated Network Systems (**ECINS**) platform.
- 2.3. When an incident occurs in a JCP Youth Environment, all JCP Youth staff must preserve evidence of the incident, if it is safe and they are reasonably able to do so, including:
 - a) Preserve the area and the environment where the alleged incident occurred.
 - b) Take steps to ensure that the person who has allegedly committed abuse or engaged in misconduct, and the child or young person who is the alleged victim remain in

- their clothing. If this is not possible, ensure that the clothing is not washed and placed into a bag with minimal handling as possible.
- c) Ensure any other items which may constitute evidence including weapons or bedding remain untouched.
 - d) Ensure that any evidence which is held electronically or online is not removed, deleted, tampered with, copied or distributed (if it may constitute child abuse material).
 - e) Take reasonable precautions to prevent discussion between potential witnesses.
 - f) Take all reasonable steps to ensure the confidentiality of the incident in order to protect the privacy of the alleged victim child or young person.

Action 2: Determine if there is an obligation to report

- 2.4. JCP Youth staff must consider whether they are required to make a report under Action 2. If a JCP Youth staff member is uncertain as to whether they need to make a report, they should discuss their observations and concerns with the CEO.
- 2.5. JCP Youth staff are not required to consult with JCP Youth or gain the support of JCP Youth prior to making a report.

2.6. Reporting Obligations to Police

a) Failure to Report

A JCP Youth staff member who has information which leads them to form a reasonable belief that an abuse offence has been committed against a child under the age of 18 years, must make a report to Tasmania Police as soon as practicable.

An abuse offence includes:

- i. penetrative sexual abuse of child or young person;
- ii. person permitting penetrative sexual abuse of child or young person on premises;
- iii. persistent sexual abuse of child or young person;
- iv. indecent act with child or young person;
- v. procuring child or young person for sexual abuse;
- vi. communications with intent to procure child or young person;
- vii. penetrative sexual abuse of person with mental impairment;
- viii. indecent assault;
- ix. procuring a person for penetrative sexual abuse by threats or fraud;
- x. involving person under 18 years in production of child exploitation material;
- xi. production of child exploitation material;
- xii. incest;
- xiii. cases in which culpable homicide is murder;
- xiv. murder;
- xv. manslaughter;
- xvi. infanticide;
- xvii. concealment of birth;
- xviii. acts intended to cause grievous bodily harm or prevent apprehension;
- xix. wounding or causing grievous bodily harm;
- xx. unlawfully administering poison with intent to harm;
- xxi. administering a noxious thing;

- xxii. failure to supply necessities;
- xxiii. ill-treatment of children;
- xxiv. female genital mutilation; and
- xxv. removal of child from State.

b) *Failure to Protect*

A JCP Youth staff member who has a reasonable belief that there is a substantial risk that a child will become the victim of a sexual offence committed by another adult associated with JCP Youth, and by reason of their position, has the power or responsibility to reduce or remove that risk, must not negligently fail to take all reasonable steps in the circumstances to reduce or remove that risk, noting that reporting to Strong Families Safe Kids Advice and Referral Line (**SFSK**) or Tasmania Police is one way to reduce or remove that risk.

2.7. Reporting Obligations to the SFSK and/or Police

a) *Mandatory Report*

A JCP Youth staff member who, in the course of carrying out their official duties, forms a belief or suspects, on reasonable grounds, or knows, that a child or young person:

- i. has been abused or neglected;
- ii. is a child whose safety, psychological wellbeing or interests have been affected or are likely to be affected by family violence; or
- iii. has a reasonable likelihood of being killed or abused or neglected by a person who the child or young person resides with;

Or while a woman is pregnant, that there is a reasonable likelihood that after the birth of the child, the child:

- i. will suffer abuse or neglect;
- ii. may be killed by a person who the child resides with; or
- iii. will require medical treatment or other intervention as a result of the behaviour of the woman, or another person the woman resides with before the birth of the child;

The JCP Youth staff member must make a report to the Secretary of the Child Safety Service or SFSK as soon as practicable after they have formed the belief or suspicion or gained the knowledge.

A prescribed person includes all persons referred to in Section 14 of the *Children, Young People and their Families Act 1997* (Tas) and includes but is not limited to:

- i. medical practitioners;
- ii. registered or enrolled nurses;
- iii. midwives;
- iv. dentists, dental therapists, dental hygienists or oral health therapists;
- v. psychologists and psychiatrists;
- vi. police officers;
- vii. probation officers;

- viii. principals and teachers;
- ix. kindergarten teachers, childcare workers and childcare managers;
- x. members of the clergy;
- xi. members of the Tasmanian Parliament;
- xii. Government employees providing health, welfare, education, child care or residential services wholly or partly for children and young people;
- xiii. organisations receiving funding from the Crown for the provision of such services; and
- xiv. any other person of a class determined by the Minister to be prescribed persons

b) *Voluntary Report*

- i. A JCP Youth staff member who knows, forms a belief, or suspects, on reasonable grounds, that a child or young person is suffering or is likely to suffer abuse or neglect has a responsibility to take steps to prevent abuse or neglect from occurring by making a report to the Secretary of the Child safety Service or SFSK.
- ii. A JCP Youth staff member who knows, forms a belief, or suspects, on reasonable grounds, that an unborn child once born is reasonably likely to suffer abuse or neglect or is reasonably likely to require medical treatment or other intervention as a result of the behaviour of the woman, or another person who the child or mother resides with, before the birth of the child has a responsibility to take steps to prevent abuse or neglect from occurring by making a report to the Secretary of the Child Safety Service or SFSK.

2.8. Notification to the Office of the Independent Regulator

- a) JCP Youth will report any reportable allegation made against a JCP Youth staff member to the OIR within three (3) business days of becoming aware of the allegations in accordance with the Scheme.
- b) A **reportable allegation** arises when a person reasonably suspects that a JCP Youth staff member has engaged in reportable conduct or misconduct which may involve reportable conduct.
- c) The JCP Youth staff member should advise the Leader of an Organisation if they become aware of conduct which may constitute a reportable allegation, which includes conduct which occurs outside the course of a person's employment. The JCP Youth staff member should complete an Incident Report Form and document the incident on the ECINS platform, which will notify the Director of the reportable allegation.
- d) If the reportable allegation involves the CEO, the reportable allegation must be reported directly to the Board Chair.
- e) The Leader of an Organisation must complete the following actions:
 - i. **Notify:**
 - A. Notify the OIR within three (3) working days of becoming aware of a reportable allegation, irrespective of whether the conduct in question is

alleged to have occurred within the course of the JCP Youth staff member's engagement with JCP Youth, pursuant to the Scheme.

- B. The Leader of an Organisation is required to respond to reportable allegations as outlined in this Procedure and as it deemed necessary to ensure child safety is paramount.

ii. **Investigate:**

- A. Put in place measures to manage potential risks to children and young people.
- B. Identify whether the child or young person identifies as Aboriginal or Torres Strait Islander, and if so, nominate a culturally appropriate support person for the child or young person.
- C. Appoint an Investigator to investigate the reportable allegations, pursuant to the Scheme, in accordance with this Procedure.
- D. Investigate the allegation – subject to police clearance on criminal matters.
- E. Advise the OIR who is undertaking the investigation.
- F. Cooperate and share information with all regulatory authorities in relation to the investigation, including SKSF, the Child Safety Service Police and the OIR.

iii. **Update:**

- A. Advise the OIR who is undertaking the investigation and provide information regarding the reportable allegation and any actions which are being taken.
- B. Provide the OIR with updates in accordance with the Scheme, including providing a 30-day update and any other updates as requested by the OIR.

iv. **Outcome:**

- A. Provide the OIR with the investigation report and annexures and notify the OIR of the investigation findings and any disciplinary action (if any taken).
 - B. Conduct a root cause analysis of the incident.
- f) Should a JCP Youth staff member determine not to report the allegation to JCP Youth as required by this Procedure, the JCP Youth staff member must ensure that all other external reporting obligations are complied with in accordance with the Framework.

Action 3: Procedure for Making a Report (if required)

2.9. Reporting to SFSK and/or Tasmania Police

- a) If a JCP Youth staff member determines under Action 2 that they are required to make a mandatory report, or a voluntary report, the JCP Youth staff member must make the report by contacting the SFSK Advice and Referral Line by following the instructions on the [SFSK website](#).

2.10. Reporting to Tasmania Police

- a) If a JCP Youth staff member determines under Action 2 that they are required to make a report to Tasmania Police they can do so by:

- i. Dialling 000 if it is an emergency;
 - ii. Contacting Arch if the matter related to sexual harm. Further information can be found on [Arch's website](#);
 - iii. Contacting the local police station. Further information can be found at [Find a Police Station](#); or
 - iv. Reporting through Crime Stoppers at [Crime Stoppers Australia - Your Community, Your Call](#).
- b) If a JCP Youth staff member makes a notification in accordance with Action 3, the JCP Youth staff member should notify the CEO that they have made that notification. Should the JCP Youth staff member determine not to notify JCP Youth according to this Procedure, they must ensure that all external reporting obligations are met.
- c) If the CEO becomes aware or is notified that a child or young person is, or may be, at risk of harm, they must act in accordance with this Procedure.

2.11. Office of the Independent Regulator

- a) If the Leader of an Organisation determines that a reportable allegation has been made in relation to a current JCP Youth staff member, the Procedure set out in Action 2, Step 3 should be followed.

2.12. Stand down and interim disciplinary action

- a) Where JCP Youth is aware of any allegations or concerns that any JCP Youth staff may have engaged in conduct that causes a child or young person harm or risk of harm, JCP Youth may, at its discretion:
 - i. Stand the JCP Youth staff member down while an investigation is conducted.
 - ii. Modify the JCP Youth staff member's role to mitigate risk, which may include removing or limiting their contact with children and young people and/or any other action deemed appropriate to mitigate the risk of harm to children and young people.
 - iii. Direct the JCP Youth staff member to return any keys, passes or equipment and to provide any access codes or passwords.
 - iv. Limit the JCP Youth staff member from having access to JCP Youth Environments.

Action 4: Cooperate with regulatory authorities

- 2.13. JCP Youth and all JCP Youth staff must cooperate with any investigation by the Police, SFSK, the Child Safety Service, other regulatory authority, or any independent investigation conducted by or on behalf of JCP Youth.
- 2.14. JCP Youth will provide support to any children or young people who are alleged victims or witnesses to the investigation as deemed appropriate by JCP Youth.
- 2.15. All correspondence from regulatory authorities in relation to the investigation should be directed to the Child Safety Officer or the Director, unless correspondence is for the confidential attention of an individual JCP Youth staff member.
- 2.16. JCP Youth will not commence or cause to commence any investigation until Tasmania Police, the Child Safety Service, and/or SFSK have given express authority to do so.

- 2.17. JCP Youth acknowledges that SFSK, Child Safety Service or Police may conduct interviews of children and young people without the knowledge of JCP Youth or parental consent. Should a police officer or a child safety officer from the Child Safety Service attend JCP Youth premises, the JCP Youth staff member should request to see identification before permitting them to have access to the child or young person. JCP Youth will take all steps necessary to ensure that the child or young person is supported through this process.
- 2.18. JCP Youth will notify any other relevant government regulator of the allegations, as required by law.

Action 5: Independent Investigation

- 2.19. Once clearance has been provided to JCP Youth by the relevant regulatory authorities, it will notify the Investigator to commence an investigation in accordance with the Scheme. Wherever possible, child safety investigations will be conducted by an independent Investigator.
- 2.20. If the conduct is not subject to the Scheme, JCP Youth may decide to conduct its own internal investigation. The CEO will appoint a relevant person to manage the internal investigation.
- 2.21. All investigations undertaken by or on behalf of JCP Youth will be undertaken in accordance with the principles of procedural fairness and natural justice and will comply with the obligations under the Scheme (if applicable).
- 2.22. All JCP Youth staff must fully cooperate with any investigation and provide information in good faith.

Action 6: Confidentiality

- 2.23. Following a report and during an investigation, JCP Youth staff are required to protect confidentiality and the interests of:
- a) The alleged victims including children, young people and their families.
 - b) The persons who made the report.
 - c) Any witnesses who are involved in the investigation process.
 - d) Any representative of or another person associated with JCP Youth who is implicated in the report.
- 2.24. Internal information sharing and information sharing to external agencies must only be undertaken in accordance with the JCP Youth Information Management Policy, which can be located in Section 11.2 of JCP Youth's Policies and Procedures document.

Action 7: Internal investigation finalised

- 2.25. Following an investigation conducted by or on behalf of JCP Youth, findings and recommendations should be made.
- 2.26. JCP Youth has full discretion to put in place safety management plans or take disciplinary action where it forms a reasonable belief that it is not safe for a JCP Youth staff member to interact with children and young people in accordance with its duty of care.

- 2.27. The findings of the investigation will also be reported to any external body as required.
- 2.28. JCP Youth will endeavour to offer support to any JCP Youth staff or member of the JCP Youth community involved where appropriate.

Action 8: Evaluation and review

- 2.29. Following the finalisation of all child safety investigations, JCP Youth will ensure that it reviews the findings of the investigation and takes all actions required to mitigate any identified risks or systemic issues to reduce the likelihood of future harm to children and young people associated with JCP Youth.
- 2.30. JCP Youth will conduct a root cause analysis following every child safety investigation to improve child safety within JCP Youth. JCP Youth will ensure that policies and procedures reviewed as required.

Child Safety Code of Conduct

1. Introduction

- 1.1. JCP Youth has zero tolerance to child abuse and harm. All JCP Youth staff have a legal and moral obligation to keep children and young people safe and promote their best interests. All children and young people regardless of their age, gender identity, sexual orientation, ethnicity, religious beliefs, ability and family background have the right to be protected from harm and to be treated with dignity, respect and integrity.
- 1.2. As a child safe organisation we are committed to providing welcoming, safe and accessible environments where children and young people feel valued, listened to and considered in decisions that affect their lives. The need to remove or reduce the risk of child abuse informs our decision-making concerning children and young people in our care. We have specific policies, procedures and practices in place to support our people to achieve these commitments.
- 1.3. The Child Safety Code of Conduct (**Code**) should be read in conjunction with the Framework.
- 1.4. If any person believes a child or young person is at immediate risk of child abuse or harm, telephone 000.

2. Acceptable Behaviours

- 2.1. JCP Youth is a place where all children and young people can actively participate in community life, feel safe and valued, and can reach their full potential. Child safety and wellbeing is the responsibility of all JCP Youth staff, regardless of whether or not they are employed in child-related work. Appropriate behaviour is essential for ensuring that children and young people are protected from child abuse and harm.
- 2.2. All JCP Youth staff **must** engage in the following acceptable behaviours, including but not limited to:
 - ✓ Uphold JCP Youth's Statement of Commitment to Child Safety and Wellbeing at all times.
 - ✓ Act in accordance with JCP Youth's Framework.
 - ✓ Promote the rights, safety and wellbeing of all children and young people, including in planning and decision making.
 - ✓ Be vigilant, proactive and take all reasonable steps to protect children and young people from abuse and harm.
 - ✓ Treat all children and young people with respect, equity and dignity.
 - ✓ Ensure that children and young people are supervised appropriately with consideration given to their age, development and other vulnerabilities, to ensure that risk of harm is mitigated toward the child and others.
 - ✓ Listen and respond to safety concerns and the views of children and young people seriously and in compliance with the Procedure, particularly if they communicate (verbally or non-verbally) that they or another child or young person has been harmed, is at risk of being harmed, or they feel unsafe.
 - ✓ Place the interests of any child or young people who has been harmed, or at risk of being harmed, above the interests of the organisation or other individuals within it

and, ensure the immediate safety of a child or young person who has been harmed or abused.

- ✓ Provide welcoming, safe and accessible environments that protect children and young people from violence, racism, bullying, teasing, threatening, and discriminatory conduct, and enables the participation of all children and young people.
- ✓ Manage dual relationships (where a prior relationship exists with a child or family) in accordance with this Code and the Framework and escalate child safety concerns about dual relationships, according to the Procedure.
- ✓ Demonstrate appropriate personal and professional boundaries.
- ✓ Behave respectfully and ethically towards children, young people and their families and towards other JCP Youth staff.
- ✓ Promote the cultural safety of Aboriginal and culturally and/or linguistically diverse children and young people and the safety of children and young people with a disability.
- ✓ Be a positive role model, including by supporting children and young people to learn protective behaviours, empowering children and young people to speak up if they have concerns for their safety or wellbeing, and ensuring children and young people are aware of their rights and have access to this information.
- ✓ Provide opportunities that reflect the diverse needs of children and young people and empower them to fully participate in the community, including our services and programs.
- ✓ Recognise children and young people as active citizens, agents in their own lives and encourage them to contribute to issues and decisions that directly affect them, including decisions about activities, policies and processes.
- ✓ Identify and mitigate risks to children and young people's safety and wellbeing and adhere to risk mitigation strategies and safe work practices, identified by and relevant to the work area.
- ✓ Complete relevant training and other professional development activities as required and communicate any deficits in child safety knowledge to a Supervisor and/or the COO.
- ✓ Report any breach of the Code by a JCP Youth staff member to a Supervisor or the COO (or next level Manager where the concern involves a Supervisor) immediately and in accordance with the Procedure.
- ✓ Report all suspected or disclosed child abuse or harm as required by any relevant legislation and by the Framework for internal and external reporting.
- ✓ Comply with legislation and the Framework in relation to record keeping and information sharing.
- ✓ Notify the COO of JCP Youth immediately if a complaint or allegation regarding child safety has been made against them, including outside the ordinary course of their employment with JCP Youth.
- ✓ Ensure that JCP Youth is registered on their WVPR and cause any adverse or negative notices to be provided to JCP Youth.

3. Unacceptable Behaviours

3.1. JCP Youth staff **must not:**

- ✗ Engage in any unlawful activity towards, against, with or in the presence of a child or young person, or threaten to engage in such conduct.

- ✘ Engage in any form of child abuse or harm towards, against, with or in the presence of a child or young person, or threaten to engage in such conduct.
- ✘ Engage in '*grooming behaviour*' or behaviour which may be considered '*grooming behaviour*' including but not limited to spending time with a child or young person to the exclusion of others or showing favouritism towards a child or young person (e.g. by offering a child or young person gifts or special treatment).
- ✘ Exhibit behaviours with children and young people which may be construed as unnecessarily physical or engage in physical contact which is intrusive.
- ✘ Hit, physically assault, or engage in physical contact with a child or young person unless there is a lawful excuse.
- ✘ Engage in oppressive or threatening behaviour toward a child or young person.
- ✘ Be alone with a child or young person, unless required to perform the duties of the JCP Youth staff member's role (note that JCP Youth recommends any 1:1 contact with a child or young person should be avoided, where possible. JCP Youth staff should ensure appropriate risk mitigation strategies are in place, including that their role is carried out in public places, avoiding unnecessary places and using areas with CCTV, wherever possible).
- ✘ Communicate with a child or young person (verbally or non-verbally) in an angry, intimidating or threatening manner.
- ✘ Communicate with or in the presence of a child or young person in a sexually explicit, adult or inappropriate manner (e.g. telling stories or jokes which are sexual or inappropriate).
- ✘ Condone or make self-disclosures about past or present participation in illegal or unsafe behaviours when speaking to or in the presence of a child or young person.
- ✘ Smoke, consume alcohol or illicit drugs, or be substance affected when working with children and young people.
- ✘ Use inappropriate language in the presence of children and young people or show or provide children and young people with access to inappropriate images or material.
- ✘ Engage in physical contact with a child or young person (i.e. kiss, hold, cuddle) not deemed to be appropriate to the JCP Youth staff member's role, or in compliance with this Code.
- ✘ Do things of a personal nature (i.e. toileting or changing clothes) that the JCP Youth staff member could not reasonably expect a child or young person to do for themselves, unless performing personal care duties as part of the JCP Youth staff member's role, or in unavoidable situations (i.e. preventing an accident or administering first aid).
- ✘ Use inappropriate, discriminatory, prejudicial, oppressive, harassing, abusive, sexually explicit, demeaning or culturally insensitive language when speaking to, or in the presence of a child or young person.
- ✘ Discriminate against any child or young person on the basis of age, gender, race, culture, religion, disability, vulnerability, sexuality or other protected attributes, or express personal views on such attributes when speaking to or in the presence of a child or young person.
- ✘ Communicate with a child or young person and/or their family outside of work.
- ✘ Arrange personal contact (including online contact by social media, email, instant messaging), or exchange personal contact details for the purposes of engaging in personal contact, with a child or young person for a purpose unrelated to JCP Youth's direct activities or services.

- ✗ Solicit, conduct or accept requests from children, young people, and/or their families for private services (i.e. babysitting, non-authorised home visits, or private lessons) delivered outside of the JCP Youth staff member's role.
- ✗ Provide personal contact details (e.g. phone number, home address, email/social media addresses) to children and young people and the parents of children and young people you interact with at work.
- ✗ Use social media/online platforms to solicit or befriend a child or young person, or have online contact with a child or young person that is not disclosed to JCP Youth or part of an approved program or activity.
- ✗ Take, use or publish unauthorised images of children or young people in JCP Youth's programs and activities.
- ✗ Disclose personal or sensitive information about a child or young person, including images of a child or young person, unless the child or young person and their parent or legal guardian provides consent or unless required to do so by JCP Youth's policy and procedure on reporting.
- ✗ Post or publish any information about a child or young person online, including personal information such as their name, age, email address, telephone number, photographs or videos.
- ✗ Use personal devices to take images of children and young people.
- ✗ Ignore or disregard any suspected or disclosed child abuse or harm.
- ✗ Retaliate against a child, young person, or person who raises a concern.
- ✗ Put a child or young person at risk of abuse or harm either through negligence or inaction.

3.2. If any JCP Youth staff believes that the Framework has been breached, they will:

- ✓ Act to prioritise the best interests of children and young people.
- ✓ Take actions swiftly in accordance with the Procedure to ensure that children and young people are safe.
- ✓ Promptly report any concerns to JCP Youth's COO or their Supervisor.
- ✓ Follow JCP Youth's Framework for receiving and responding to complaints and concerns.
- ✓ Comply with all legislative requirements on reporting and comply with JCP Youth's Policy and Procedure on internal and external reporting.

4. Physical Contact with a Child or Young Person

4.1. When working with children and young people, appropriate and non-intrusive physical contact may occur. JCP Youth staff must consider the following principles in relation in determining whether physical contact with a child and young person is appropriate in the circumstances.

4.2. Physical contact **must** be:

- ✓ Non-intrusive and would be deemed appropriate by a reasonable person in the context (e.g. high five, pat on the shoulder, holding a young child's hand to cross the road, placing an arm around the shoulder of a distressed young person).
- ✓ Appropriate to the developmental needs of the child or young person.
- ✓ Strictly in line with the types of physical contact necessary to perform the duties and responsibilities of the JCP Youth staff member's role.

- ✓ Open, non-secretive and culturally sensitive.
- ✓ Attuned to the child or young person's cues and what the child or young person is comfortable with.
- ✓ Where possible or age appropriate, subject to the consent of the child or young person (e.g. ask a child in distress if it is ok to give them a hug; when performing first aid or duties of a personal nature tell the child where you need to touch them, why, and ask if it is ok).

4.3. JCP Youth staff **must**:

- ✓ Where possible or age appropriate, explain to the child or young person what they intend to do when engaging in physical contact and seek their permission prior to any contact occurring. Consent from a child or young person may be withdrawn at any stage of the physical contact.
- ✓ Respect signs that a child or young person is uncomfortable with physical contact or has withdrawn consent from physical contact (e.g. a child moving away, or averting their eyes, showing distress).
- ✓ Respect cultural sensitivities specific to physical contact with children and young people from diverse cultures. Cultural practices and norms in relation to physical contact vary significantly and require exploration (e.g. in some cultures it may be appropriate for a child to hold hands with an adult whereas in other cultural groups, physical contact with an unrelated adult or an adult of a different gender is not permitted).
- ✓ Respect the capabilities of children and young people with a disability (e.g. respect the independence of a young person who has a disability by asking whether they would like assistance).

4.4. JCP Youth staff **must not** engage in any physical contact:

- ✗ To the mouth, groin, genitals, buttocks and breasts other than in medical emergency situations (e.g. when using a defibrillator, giving mouth-to-mouth resuscitation).
- ✗ That is initiated by the JCP Youth staff to meet their own needs.
- ✗ That would appear to a reasonable observer to be sexual in nature.
- ✗ Intended to cause a child or young person distress or harm.
- ✗ That involves roughhousing, wrestling, massage, horseplay or tickling.
- ✗ That is against a child or young person's wishes or consent.
- ✗ In relation to personal care that the child or young person does not require assistance with (e.g. toileting, dressing, showering).

5. Communicating with Young People

- 5.1 Language plays a crucial role in establishing trust and rapport with young people. Appropriate language fosters respect, builds a sense of belonging, and enhances positive relationships. Conversely, inappropriate or overly familiar language can lead to confusion, discomfort, or breaches of professional boundaries.
- 5.2 Key Principles: Respect, Cultural Sensitivity, Age appropriateness, Professional Boundaries
- 5.3 To ensure consistency, belonging, and emotional safety, JCP Youth has established the common term "Love and Respect". This specific term is used uniformly across all interactions, particularly when ending engagements or conversations with young people

where a strong relationship has been established. The phrase "Love and Respect" is the only acceptable emotional departing term. No abbreviations, variations, or substitutes (e.g., "Love you", "Respect you", etc.) are permitted. If the context is not appropriate for this term, facilitators and staff must use neutral language, such as, "Thank you for your time" or simply "Goodbye".

6. Breaches of the Code

- 6.1. Breaches of this Code will be investigated on a case-by-case basis in accordance with the JCP Youth Policies and Procedures document.
- 6.2. Any conduct that constitutes or may constitute a criminal offence under the *Crimes Act 1924* (Tas) will be reported to Tasmania Police. This applies irrespective of whether or not it occurred outside of a JCP Youth staff member's role or while a JCP Youth staff member was undertaking JCP Youth business.
- 6.3. Reportable allegations will be reported to the OIR and investigated as required by the *Child and Youth Safe Organisations Act 2023* (Tas).
- 6.4. Breaches of this Code may result in disciplinary action including the termination of a person's engagement or employment with JCP Youth.

7. Requirement to Review, Understand and Comply with the Code

- 7.1. JCP Youth staff must review this Code during the induction period and must understand and agree to comply with the Code before commencing their role.
- 7.2. For relevant positions, or where contact with children and young people is probable, the Code must be read before the staff member commences any duties that involve direct contact with children and young people.
- 7.3. JCP Youth staff should raise any questions, queries, or concerns about the Code with their Supervisor immediately.
- 7.4. JCP Youth staff should retain a copy of the Code for their personal reference and review.
- 7.5. Supervisors should review compliance with the Code at the JCP Youth staff member's six-month review period, and annually thereafter.

8. Related Legislation

- *Australian Human Rights Commission Act 1986* (Cth)
- *Children, Young Persons and their Families Act 1997* (Tas)
- *Child and Youth Safe Organisations Act 2023* (Tas)
- Child and Youth Safe Standards
- *Criminal Code Act 1924* (Tas)
- *Registration to Work with Vulnerable People Act 2013* (Tas)

9. Related Policies and Procedures

- JCP Youth Child Safety Reporting Procedure
- JCP Youth Child Safety and Wellbeing Policy
- JCP Youth Commitment to Child Safety
- JCP Youth Policies and Procedures document

10. Review

- 10.1. This Code will be reviewed annually by the CEO and following every critical incident or child safety investigation.
- 10.2. The CEO will make changes as needed to respond to information from child safety reviews or investigations.
- 10.3. JCP Youth welcomes feedback from all members of the community including families on how it can improve its risk management approach and better protect the safety of children and young people. Please direct feedback to the CEO or Board in writing.
- 10.4. A review of the Framework shall be conducted annually by the CEO, and after every critical child safety incident.

Child Safety Training Plan

1.0 Introduction

JCP Youth ensures all personnel receive ongoing, role appropriate child safety training so they understand their obligations, can identify and respond to child safety risks, and contribute to a strong child safe culture across all JCP Youth environments. This Training Plan applies to all JCP Youth staff, including employees, volunteers and Board members.

2.0 Training Requirements

2.1 Induction Training (Mandatory)

All new JCP Youth staff must complete child safety training as part of induction and before unsupervised contact with children and young people.

Induction training includes:

- Child Safety and Wellbeing Framework;
- Child Safety Code of Conduct;
- Identifying indicators of child abuse and harm;
- Professional boundaries and grooming behaviours;
- Reporting obligations and procedures;
- Cultural safety and inclusion.

2.2. Mandatory Online Child Safety Training

All JCP Youth staff must complete the approved online child safety training module:

- During induction; and
- Annually thereafter.

2.3. Ongoing and Refresher Training

Annual refresher training for all staff to reinforce:

- Reporting responsibilities;
- Legislative and policy updates;
- Emerging risks and trends.

Additional role specific training is provided to:

- Managers, Supervisors and District Leaders;
- Mandated reporters;
- Board members, focusing on governance and oversight responsibilities.

2.4. Supervision and Continuous Learning Child safety training is reinforced through:

- Standing child safety agenda items at leadership and district meetings;
- Scenario based discussions and reflective practice;
- Targeted training following incidents, reviews or identified risks.

3.0 Records and Documentation

JCP Youth maintains records of:

- Induction and refresher training completion;
- Online training completion;
- Role specific and professional development activities.

Records are stored securely in accordance with JCP Youth's Information Management and Privacy policies.

4.0 Review and Monitoring

- Training compliance is monitored by the COO and Human Resources.
- This Training Plan is reviewed annually and following any critical child safety incident or investigation.

Definitions

Term	Definition
Aboriginal	The term Aboriginal in this Policy includes Aboriginal and Torres Strait Islander peoples.
Applicant	A person who applies for a position or role at JCP Youth which involves engaging in or participating in a regulated activity with children or young people.
Child Abuse	Conduct towards, against, with or in the presence of a child, or threatening to engage in such conduct, which includes: a) Physical abuse b) Sexual abuse or conduct of a sexual nature, including a sexual offense against a child and grooming behaviour c) Emotional or psychological harm, including spiritual abuse d) Neglect e) Discrimination f) Bullying
Child, children or young person	A child or young person is a person who is under 18 years of age, unless otherwise defined by law or noted in this Policy or the Procedure.
Child-related work	Work authorised by JCP Youth and performed by a person over 16 years of age in a JCP Youth Environment while children or young people are present or reasonably expected to be present.
Child Safety	Matters related to JCP Youth exercising its duty of care to children and young people in its care, protecting all children and young people from harm or a risk of harm, managing the risk of child abuse or harm, taking steps to identify, prevent and mitigate the occurrence of child abuse and harm, providing support and responding to a child or young person who is at risk or has disclosed or made allegations of child abuse or harm.
Child and Youth Safe Standards	The 10 Standards and the Universal Principle made under Part 3 of the <i>Child and Youth Safe Organisations Act 2023</i> (Tas). The CYSS can be found here .
Child Safe Organisation	Defined by the Child and Youth Safe Organisations Framework as one that recognises cultural differences and does not reduce a child or young person's right to be safe, or the organisation's responsibility to protect the child or young person from harm.
Child Safety and Wellbeing Framework	The Child Safety and Wellbeing Framework includes JCP Youth's: a) Statement of Commitment to Child Safety and Wellbeing b) Child Safety and Wellbeing Policy c) Child Safety Reporting Procedure

	d) Child Safety Code of Conduct
Communities	A group of people with whom a child or young person shares common interests, experiences, social background, nationality, culture, beliefs or identity.
Contractor	Any individual, business or company engaged by JCP Youth to provide services to JCP Youth.
Cultural Rights	You have a right to enjoy your culture, practise your religion and use your language. This right applies to all sorts of cultural, religious, racial or linguistic backgrounds. ¹
Cultural Safety	A culturally safe environment that is safe for people of all ethnicities and cultural identities, where there is no assault, challenge, or denial of their identity, of who they are and what they need. Cultural safety requires shared respect, shared meaning, shared knowledge, and experience of learning, living and working together with dignity and truly listening, and in which the diverse and unique identities and experiences of all children and young people are respected and valued. This includes the distinctive history and experience of Aboriginal peoples and people who have come to Australia from diverse cultures.
Direct Contact	Physical or face-to-face contact, or written (including postal), oral or electronic communication.
Disclosure	Disclosures of actual, suspected or risk of child abuse or harm may be verbal or non-verbal, accidental or intentional, partial or complete.
Duty of Care	A common law requirement which places a duty on JCP Youth and all JCP Youth staff to take reasonable steps to protect children and young people from harm that is reasonably foreseeable.
Grooming	The offence of grooming concerns predatory conduct undertaken to prepare a child or young person for sexual activity at a later time. The offence applies where an adult communicates, by words or conduct, with a child or young person under the age of 16 years or with a person who has care, supervision or authority for the child or young person with the intention of facilitating the child or young person's involvement in sexual conduct, either with the groomer or another adult. Grooming does not necessarily involve any sexual activity or even discussion of sexual activity – for example, it may only involve establishing a relationship with the child, young person, parent or carer for the purpose of facilitating sexual activity at a later time. The sexual conduct must constitute an indictable sexual offence. This includes offences such as sexual penetration of a child or young

¹ Charter of Human Rights and Responsibilities Act 2006 (Vic)

	person indecent assault, and indecent acts in the presence of a child or young person. ²
Indicators of Abuse	The signs which a child or young person may display which indicate that they may have been abused or harmed. Some children and young people show no indications of harm, while others may show many however none of the indicators are determinative. Further information in relation to Indicators of Abuse can be found at this link: Indicators of Abuse Child Safe Standards Resources, Department of Families Fairness and Housing.
JCP Youth Environments	All physical and virtual environments and places made available or authorised by JCP Youth for use for children and young people, including but not limited to: a) The offices of JCP Youth b) JCP Youth physical environments including but not limited to public spaces and 3rd party contractor premises such as schools, camp sites and youth justice and detention centres c) JCP Youth online environments including but not limited to email, portals, intranet systems, virtual messenger services, social media and other online communications Other locations provided by JCP Youth or a third-party provider where JCP Youth conducts activities or services including visitation or outreach. Other locations include but are not limited to non-JCP Youth property including public space, schools, camp sites, youth justice and detention centres, and homes.
JCP Youth staff	All people acting as representatives of JCP Youth including full time, part time, casual and agency staff, contractors, volunteers and students.
Leader of an Organisation	The Leader of an Organisation pursuant to the <i>Child and Youth Safe Organisations Act 2023</i> (Tas). The Leader of an Organisation of JCP Youth is the CEO.
Mandatory Reporting	Mandatory reporting is the legal requirement for prescribed persons to make a report to the Secretary of the Child Safety Service or the Strong Families Safe Kids Advice and Referral Line. Prescribed persons, who, in the course of carrying out their official duties, forms a belief or suspects, on reasonable grounds, or knows, that a child or young person has been abused or neglected, is a child whose safety, psychological wellbeing or interests have been affected or likely to be affected by family violence, has a reasonable likelihood of being killed or abused or neglected by a person who the child or young person resides with are required to make a mandatory report. Prescribed persons, who, in the course of carrying out their official duties, forms a belief or suspects, on reasonable grounds, or knows,

² [Grooming offence | Department of Justice and Community Safety Victoria](#)

	that a child, once born will suffer abuse or neglect, may be killed by a person who the child resides with, or will require medical treatment or other intervention as a result of the behaviour of the woman, or another person the woman resides with before the birth of the child are required to make a mandatory report.
Office of the Independent Regulator	The Office of the Independent Regulator as established by the <i>Child and Youth Safe Organisations Act 2023</i> (Tas).
Prescribed person	A prescribed person is a person as defined pursuant to section 14 of the <i>Children, Young People and their Families Act 1997</i> (Tas) as amended from time to time. A prescribed person includes: a) Medical practitioners b) Registered or enrolled nurses c) Midwives d) Dentists, dental therapists, dental hygienists or oral health therapists e) Psychologists and psychiatrists f) Police officers g) Probation officers h) Principals and teachers i) Kindergarten teachers, childcare workers and childcare managers j) Members of the clergy k) Members of the Tasmanian Parliament l) Government employees providing health, welfare, education, childcare or residential services wholly or partly for children and young people m) Organisations receiving funding from the Crown for the provision of such services; and n) Any other person of a class determined by the Minister to be prescribed persons
Racism	Racism is harmful for children and young people and impacts upon their safety and wellbeing. Racism can be a form of child abuse and may cause harm. Racism may manifest as harassment, abuse or humiliation. It can sometimes lead to intimidation or violence. Racism includes name calling and hurtful jokes and excluding people from groups or activities. It can also include comments that demonstrate a lack of respect for another person.
Reasonable Belief	A reasonable belief is a belief based on facts that would lead a reasonable person to think that reportable conduct may have occurred. A reasonable belief is more than suspicion. There must be some objective basis for the belief. However, it does not require certainty. For example, a person is likely to have a reasonable belief if they: a) Observed the conduct themselves b) Heard from a child that the conduct occurred

	c) Received information from another source (including another person who witnessed the reportable conduct or misconduct)
Regulated activity	Under the <i>Registration to Work with Vulnerable People Act 2013</i> (Tas), a ‘<i>regulated activity</i>’ is work in either a voluntary or paid capacity, that usually involves direct contact with a child or young person that includes: a) Child-related activities b) Child and vulnerable-adult related activities c) Child and vulnerable-adult related (NDIS endorsed) activities d) A category of activity or service prescribed by the Regulations
Volunteer	A person who performs work without remuneration or reward for JCP Youth where children and young people are present or are reasonably expected to be present.
Wellbeing	A positive state of physical, mental and emotional health. Wellbeing generally means feeling safe, happy and healthy more than momentarily. Wellbeing can be achieved in many ways including by supporting a child or young person to express their culture that recognises their ancestry, spirituality and country.
Working with Vulnerable People Registration	A WVPR issued pursuant to the <i>Registration to Work with Vulnerable People Act 2013</i> (Tas).

Version History

Review No:	Change	Date
1	New Framework	19 March 2026