

CCW Policy 2
Child Safeguarding - Risk Management
Controlled Document

Approval
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Document Owner:	Executive Manager, Children and Youth Services		Approved by:	Chief Executive Officer	
Reviewed by:	Quality & Risk Child Safeguarding Committee		CELT		

Audience

This policy applies to all CatholicCare Wollongong (We/Our/CatholicCare) employees including authorised carers, advisors, contractors, and consultants working on a permanent, temporary, and casual basis.

Implementation responsibility

Implementation responsibility for this policy lies with all CatholicCare employees.

Objective and Purpose

We recognise that to achieve our vision of advocating with and on behalf of children and young people and intervening to protect them from all forms of abuse, violence, injury, neglect, and exploitation, it is the intention of CatholicCare Wollongong that children and young people are empowered, valued, listened to and wherever possible, participate in decision making.

This policy sets out our commitment to being a Child Safe Organisation with a child safe culture embedded in all levels of our Agency. We have a zero tolerance towards the harm of children and young people. In doing this we will uphold the rights of all children to participate to their full capacity, regardless of their gender, race, ability, or cultural background.

This policy is intended to assist in actively identify and mitigate risks that children and young people may face while partaking in support and services provided by us. Through our effective risk framework, Child Safe Risk Management Plan (CSRMP), and various procedures, we preserve and/or strengthen the safety and wellbeing of every child and young person while engaging with CatholicCare Wollongong services.

Our objective for developing this policy is to set the expectations of CatholicCare employees, authorised carers, advisors, contractors, and consultants employed by CatholicCare Wollongong to work with children and/or young people when attending CatholicCare services.

Therefore, CatholicCare Wollongong will:

- adhere to all standards identified in the Child Safe Standards.
- operate on the assumption that all people who interact with children and young people could pose some level of risk to them.
- recognise the importance of considering risks while not discouraging positive relationships between adults, children and young people and their development.
- ensure that identifying and reducing the risks posed to children and young people is

an ongoing process.

- strive for a culture where risk management is a daily exercise of all employees and people involved in the delivery of the agency's services.
- understand that all children and young people have different needs, backgrounds, and identities and therefore the individual risks they face will vary.
- endeavour to identify the individual risks posed to each individual child and young person who meets the agency.
- complete where required risk management assessments and safety plans in collaboration with the necessary stakeholders
- ensure all reports and necessary documents are provided to internal and external bodies.

For children and young people identified at risk, we will ensure that there is the necessary monitoring for that situation, while maintaining the privacy, rights and dignity of the child/young person.

When to use Risk Management in Child Safeguarding

Risk management in child safety should be utilised throughout all stages of engagement with children.

Ongoing risk identification and assessment are critical to identifying potential risks to child safety as they arise. This includes conducting regular risk assessments of activities, environments, and interactions to identify areas of vulnerability or potential harm.

Continuously monitor and evaluate the effectiveness of child safety measures and interventions. This includes collecting feedback from staff, children, parents and significant others, reviewing incident reports, and making adjustments to policies and procedures as needed to enhance protection.

Consequences of Policy Violations:

Violations of this policy may result in disciplinary action, up to and including termination of employment or contract. The severity of the consequences will depend on the nature and impact of the violation, as determined by CatholicCare Wollongong.

What is Risk Management

Ensuring the safety of children relies on effective risk management, which should be a collaborative effort involving both CatholicCare, children and young people, stakeholders, and communities. By proactively addressing potential risks, CatholicCare can reduce the likelihood of harm or abuse to children, thereby minimizing the long-term impact of such incidents. This builds confidence among employees, enabling them to interact with children in a structured and secure manner, which is fundamental to the framework of CatholicCare, encompassing the development of policies, procedures, and a code of conduct.

Implementing proactive protective measures not only lowers the risk of harm but also strengthens our agency's ability to respond promptly and effectively to any incidents that may arise. Furthermore, it empowers CatholicCare to establish robust child safety protocols and practices, thereby reducing opportunities for harm and abuse. Each program must tailor its risk management strategies to its unique context, continuously monitoring and adapting them over time.

Effective risk management fosters a culture of safety characterised by open communication, thorough reporting, transparency, and sound governance mechanisms.

Our Risk management Principles.

These Principles set out the standards and values that guide the outcomes of employees understanding risk management.

For everyone

- Proactively identify and address potential risks to prevent adverse outcomes.
- Establishment of clear roles and responsibility for risk management ensuring accountability at all levels of the agency.
- Foster open and transparent communication channels to facilitate the sharing of risk-related information across the agency.
- Engage all stakeholders in risk identification, assessment and mitigation efforts to leverage diverse perspectives and insights.

Mutually beneficial

- Good risk management protects children and young people and persons engaged on behalf of CatholicCare to work with the child/young person.

About the team

- Promote a culture of risk awareness within the team by encouraging proactive identification and reporting of potential risks to child safety and the appropriate action to address them.
- Above all, prioritise the best interests and well-being of children in all risk management efforts. Ensure that team members are committed to upholding ethical principles, respecting children's rights, and creating safe and supportive environments where children can thrive.

Leader Led

- Allocate resources effectively to support robust risk management practices and initiatives.
- Leaders provide clear direction and guidance to teams on how to identify, assess, and mitigate risks. They establish policies, procedures, and protocols for risk management and ensure that teams understand their roles and responsibilities.
- Leaders recognise that risk management is an ongoing process that requires flexibility and adaptability. They stay informed about changes in the external environment that may impact the agency's risk profile and adjust risk management strategies accordingly.

Context matters

- The specific activities and environments where children are involved significantly impact the types of risks they may face.
- The rapid evolution of technology introduces both opportunities and risks for child safety. CatholicCare must consider risks associated with online activities, social media, cyberbullying, and exposure to inappropriate content when developing risk management strategies.

Key Considerations

CatholicCare Wollongong has a Code of Conduct that provides guidelines on what is acceptable and unacceptable behaviour when working with children and young people to mitigate the level of harm when in the presence of CatholicCare employees. The main considerations are:

Risks posed to children and young people:

CatholicCare Wollongong will identify and mitigate risks that children and young people may face when encountering the service. Such risks include but are not limited to:

- Standard 1 – Allegations of harm is not responded to,
- Standard 2 – Children are discouraged from raising particular subjects,
- Standard 3 – There is no mechanism for families to have a voice in the agency's practices,
- Standard 4 – Workforce does not reflect the diversity within our community,
- Standard 5 – Workplace does not support Child Safety,
- Standard 6 – The complaint handling process isn't publicly available and accessible,
- Standard 7 – Indicators of abuse and neglect are not recognised,
- Standard 8 – Online safety is not a consideration,
- Standard 9 – A root cause analysis isn't conducted after a critical incident,
- Standard 10 – Policies and procedures are not accessible to stakeholders.

Physical contact with children and young people:

CatholicCare Wollongong has clear program guidelines in relation to circumstances in which it might be necessary to have physical contact with a child or young person, including but not limited to:

- Managing a child or young person who has been injured,
- Demonstrating a skill or for instructional purpose as part of an activity,
- Administering medical assistance; and
- Assisting with toileting of young children.

CatholicCare Wollongong has zero tolerance to inappropriate physical contact including:

- Violent or aggressive behaviour such as hitting, kicking, slapping or pushing,
- Kissing,
- Touching of a sexual nature, and
- Unapproved, unauthorised restrictive practices

Non-Physical contact with children and young people:

CatholicCare Wollongong has strong guidelines to reduce the impact of non-physical contact with children and young people allowing children and young people to interrelate and disclose in a trusting and safe environment.

Circumstances in which it might be necessary to have healthy non-physical contact with a child or young person, including but not limited to

- Counselling in schools or the CatholicCare Wollongong offices,
- Discussion in relation to contact visitations,
- Expectations of CatholicCare Wollongong employees.

Behaviours that do not involve touching or physical contact can be just as upsetting and emotionally harmful to a child as some physically touching behaviours. Non-touching behaviours that are considered harmful to a child or young person include but not limited to:

- Emotional harm caused through grooming techniques,

- Technology opportunities to form relationships that could involve emotional closeness,
- Increase of psychological harm due to isolation of children and young people either with an adult or exclusion from their peers,
- Exposing a child to sexual acts (including masturbation or pornography) either in person or through digital, computer or video images,
- Watching a child undress or use the bathroom, often without the child's knowledge.

Please note that although there may not be harmful intent, where a child could be involved, it has been viewed by authorities as child abuse in some circumstances.

Behaviour management:

- CatholicCare Wollongong has clear program policies on how employees are expected to manage challenging behaviours in accordance with our Code of Conduct to minimise risk of harm.

Definitions

Term	Definition
CatholicCare Executive Leadership Team (CELT)	The CELT considers and provides advice to the Director on high level strategic issues and significant policy and operational matters impacting on CatholicCare Wollongong. It comprises of Executive Managers of CatholicCare Wollongong.
Quality Systems Committee	A diverse team that oversees and contributes to the promotion, development, and implementation of systems to ensure continuous improvement in the provision of high-quality client-centric services that achieve positive outcomes for clients.
Child Safeguarding Committee	A diverse team that has membership of all service programs that work with Children and Young People. Membership also includes People & Culture Representative and Quality & Risk. There is also representation from Professional Standards at Office of the Bishop and Catholic Education Office Child Protection.
Employees	A person employed by CatholicCare Wollongong, or a person who volunteers for CatholicCare Wollongong, but excludes authorised carer
Contractors	Individuals or companies who are engaged to perform a specific service or task for a client or CatholicCare Wollongong, usually for a fee or other agreed compensation.
Authorised carer	An individual that has been authorised by a NSW designated agency to provide statutory or supported out of home care in NSW.

THIS DOCUMENT IS UNCONTROLLED WHEN PRINTED

The electronic version of this document is the approved and most current.

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Any feedback please email QR@CatholicCare.dow.org.au

Term	Definition
Department of Community & Justice (DCJ)	The Department of Communities and Justice works with children, adults, families and communities to improve lives and help people realise their potential.
Office of the Children's Guardian (OCG)	An independent statutory authority in NSW Government, promoting, regulating, and overseeing the quality of child safe organisations in NSW to uphold children and young people's right to be safe
Consultants	A person or agency engaged or on a temporary basis to provide advice and recommendations to a service program.
Advisors	A person who gives others advice or guidance.
Abuse	"All forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power" - World Health Organization (2016), Child abuse and neglect by parents and other caregivers.
Sexual abuse	When someone involves a child or young person in a sexual activity by using their power over them or taking advantage of their trust. Often children or young people are bribed or threatened physically and psychologically to make them participate in the activity. Sexual abuse is a crime.
Physical abuse	<p>A non-accidental injury or pattern of injuries to a child or young person caused by a parent, caregiver or any other person. It includes but is not limited to injuries which are caused by excessive discipline, severe beatings or shakings, cigarette burns, attempted strangulation and female genital mutilation.</p> <p>Injuries include bruising, lacerations or welts, burns, fractures or dislocation of joints. The application of any unreasonable physical force to a child is a crime in NSW. For example, hitting a child or young person around the head or neck, or using a stick, belt or other object to discipline or punish a child or young person (in a manner that is not trivial or negligible) may be considered a crime</p>
Emotional abuse or psychological harm	Serious psychological harm can occur where the behaviour of their parent or caregiver damages the confidence and self-esteem of the child or young person,

Term	Definition
	<p>resulting in serious emotional disturbance or psychological trauma.</p> <p>Although it is possible for 'one off' incidents to cause serious harm, in general it is the frequency, persistence and duration of the parental or carer behaviour that is instrumental in defining the consequences for the child or young person.</p> <p>This can include a range of behaviours such as excessive criticism, withholding affection, exposure to domestic violence, intimidation or threatening behaviour.</p>
Neglect	<p>When a parent or caregiver cannot regularly give a child or young person the basic things needed for his or her growth and development, such as food, clothing, shelter, medical and dental care, adequate supervision, and enough parenting and care.</p>
Exploitation	<p>"The use of children for someone else's advantage, gratification or profit often resulting in unjust, cruel and harmful treatment of the child.</p> <p>These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development. It covers situations of manipulation, misuse, abuse, victimisation, oppression or ill-treatment." (Save the Children, 2020)</p>
Discrimination	<p>When a person, or a group of people, is treated less favourably than another person or group because of their background or certain personal characteristics. This is known as 'direct discrimination'.</p> <p>It is also discrimination when an unreasonable rule or policy applies to everyone but has the effect of disadvantaging some people because of a personal characteristic they share. This is known as 'indirect discrimination'. (Australian Human Rights Commission)</p>
Grooming	<p>Any act with the aim of befriending, building rapport, and gaining the trust of a child for the purpose of subjecting them to abuse. Signs of grooming include giving gifts or special attention, or inappropriate touching such as tickling or wrestling with a child.</p> <p>Perpetrators can also 'groom' family members, and workers in organisations, to be seen as 'trusted' and enable them to spend time with the child they are targeting.</p>

Term	Definition
Online grooming	Establishing a relationship with a child or young person online with the aim of meeting him/her in person for sexual activity. This can include online chat or sexting, and the abuser may lie about their age or identity.
Harm	Different states or territories may have differing definitions of harm in relation to child protection legislation, but in general it refers to any significant detrimental effect on a child's physical, psychological or emotional wellbeing.

Induction and ongoing training

- Upon commencing employment with CatholicCare, employees will undergo an induction process that includes training on the principles and guidelines outlined in this policy. Furthermore, ongoing training and educational resources will be made available to ensure that employees maintain a thorough understanding of these principles and guidelines throughout their tenure with CatholicCare.
- Regular updates and reminders may also be provided to keep employees informed about changes in best practice.

Monitoring, Evaluation and Review

This policy will be reviewed periodically to ensure its effectiveness and relevance. Any necessary updates or modifications to ensure compliance with legislative and standard requirements will be communicated to all employees, contractors, and representatives of CatholicCare Wollongong.

The agency will formally review this Policy every three (3) years as part of the policy's known life cycle period.

References

Legislation

- Anti-Discrimination Act 1977
- Care and Protection Act 1998
- Children and Young Persons (Care and Protection) Act 1998 (NSW)
- Children and Young Persons (Care and Protection) Regulation 2012
- Children and Young Persons (Care and Protection) (Child Employment) Regulation 2015
- Child Protection (Working with Children) Act 2012
- Child Protection (Working with Children) Regulation 2013
- Children's Guardian Act 2019
- Crimes Act 1900
- Disability Inclusion Act 2014 (NSW)
- Education and Care Services National Regulations (2011 SI 653)
- Family Law Act 1975 (Commonwealth)

- National Disability Insurance Scheme Act 2013
- NDIS (Quality & Safeguards Commission and Other Measures) Act 2018
- UN Convention on the rights of the child

Standards

- Council of Australian Governments – National Principles for Child Safe Organisations
- Early Childhood Australia's Code of Ethics
- Office of the Children's Guardian – NSW Child Safe Standards
- Office of the Children's Guardian – NSW Child Safe Standards for Permanent Care
- United Nations Convention on the Rights of the Child
- National Catholic Safeguarding Standards
- NSW Charter of Rights for Children and Young People in Out of Home Care
- NQF – My Time, My Place: Framework for School Aged Children for Australia
- NQF – Being, Belonging and Becoming: The Early Learning Years Framework for Australia
- NQF – Education and Care Services National Laws and National Regulations
- Australian Children's Education & Care Quality Authority (ACECQA)
- Department of Social Services - Families and Children Activity Administrative Approval Requirements
- NDIS Quality and Safeguards Commission – NDIS Practice Standards

Agency Policies

- Code of Ethics and Conduct
- CCW Policy 1 Child Safeguarding
- CCW Policy 3 Child Safeguarding – Equity and Inclusion for Children and Young People
- CCW Policy 4 Child Safeguarding – Complaints Management
- CCW Policy 5 Child Safeguarding Disciplinary and Misconduct (Reportable Conduct)
- CCW Policy 6 Child Safeguarding Training and Development
- CCW Policy 7 Mandatory Reporting of Harm, Abuse & Neglect of a child (MRG)
- CS Policy 9 - Preventing and Responding to Harm and Abuse of Vulnerable People
- WS Policy 2.1 - Recruitment and Selection
- WS Policy 2.5 - Employment Screening
- WS Policy 2.7 - Employee Files
- WS Policy 2.8 - Position Descriptions
- WS Policy 4.1 - Performance Planning and Review
- WS Policy 5.1 - Training & Development
- WS Policy 4.3 - Management of Reportable Conduct Allegations against an Employee

Forms, record keeping, other documents

- Child Safe Risk Register
- Child Safe Risk Assessment Template
- Child Safe Risk Management Plan
- Child Safeguarding Code of Conduct

Approval Rating	Type of Policy
<p style="text-align: center;">Approval rating 1</p>	<p>New agency policy/adjustments that are legislated or are a Diocesan directive. Minimal collaboration required.</p>
<p style="text-align: center;">Approval rating 2</p>	<p>High level agency policies that are developed at executive management level (such as employee entitlements) go to CELT for final review before COO recommendation for approval by the CEO.</p>
<p style="text-align: center;">Approval rating 3</p>	<p>Operational agency policies are endorsed by the QSC to ensure policy is applicable across all program areas. Then go to CELT for final review before COO recommendation for approval by the CEO.</p>
<p style="text-align: center;">Approval rating 4</p>	<p>Program specific where it is only the individual program that need to ensure that the policy meets practice requirements. No QSC, CELT or CEO. However, if it is a new policy, courtesy email outlining what they are should go to the CEO, COO and EM Quality & Risk (EM Q&R) for information only.</p>

Attachments

- Nil