



# PG020 Child Safety and Wellbeing Policy

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## Glossary

Term/Acronym	Definition
Child/ children	means a person who is under the age of 18 years.
Child abuse	means: <ul style="list-style-type: none"> <li>• a sexual offence committed against a child</li> <li>• an offence committed against a child under section 49M(1) of the Crimes Act 1958 (Vic), such as grooming</li> <li>• physical violence against a child</li> <li>• causing serious emotional or psychological harm to a child</li> <li>• serious neglect of a child.</li> </ul>
Complaint	A complaint is an expression of dissatisfaction related to one or more of the following: <ul style="list-style-type: none"> <li>• our services or dealings with individuals</li> <li>• allegations of abuse or misconduct by a staff member or other individual associated with our Company</li> <li>• disclosures of abuse or harm made by a child or young person</li> <li>• the conduct of a child or young person</li> <li>• the inadequate handling of a prior concern</li> <li>• general concerns about the safety of a group of children or activity.</li> </ul>
Concern	A concern refers to any potential issue that could impact negatively on the safety and wellbeing of children.
Company	The Trustee for the Mansfield Unit Trust trading as Mansfield Mt.Buller Bus Lines Pty Ltd; and Cranbourne Transit Admin Pty Ltd atf Cranbourne Transit Admin Unit Trust; and Cranbourne Transit Pty Ltd.
Harm	is damage to the health, safety or wellbeing of a child, including as a result of child abuse by adults or the conduct of other children. It includes physical, emotional, sexual and psychological harm. Harm can arise from a single act or event and can also be cumulative, that is, arising as a result of a series of acts or events over a period of time.

# 1 CHILD SAFETY AND WELLBEING POLICY

This Child Safety and Wellbeing Policy is implemented with effect from 1 July 2022. It sets out the commitment of management and staff to child safety and wellbeing. It describes the Company keeps children safe from harm and child abuse in accordance with the Victorian Child Safe Standards.

If there is concern for the immediate safety of a child, immediately call 000.

## 1.1 Purpose

This Policy outlines how the Company prioritises the safety and wellbeing of children and what steps we will take to do this.

## 1.2 Statement of commitment to child safety

All children have a right to be and feel safe. The welfare of children we convey will always be our first priority and we do not tolerate child abuse and harm. We aim to create an environment where children feel safe being transported in our fleet.

## 1.3 The role of management

Management will take reasonable steps to ensure that children's safety is prioritised, and that action is taken when anyone raises concerns about children's safety.

Management will champion and model a child safe culture in this Company. We encourage anyone involved with the Company to report a child safety concern. Management will work to create a positive culture around reporting so that people feel comfortable raising concerns.

Everyone involved in the Company has a role in identifying and managing risks of child abuse and harm. Management will support staff to take action to manage risks, in accordance with this policy. We will also ensure that appropriate child safety training for staff is identified and completed.

## 1.4 Children's empowerment and participation

We respect the rights of children and provide them with information about their rights including the right to be safe on our services by providing a letter to the school and place a notice for to parents/guardians on our website. By doing so, we communicate with children about what they can do if they feel unsafe.

We do not tolerate bullying or abusive or racist behaviour between children and take action if this occurs.

We seek to understand what makes children feel safe on our services by valuing children's opinions. We will act on safety concerns raised by children or their families either directly or via the school. Children are encouraged to tell their teacher, their principal or their driver about any complaints or safety concerns they have in relation to their bus service.

## 1.5 Families and communities

Parents and others are invited to provide feedback with us at any time via the school, or via our email address [humanresources@busqld.com.au](mailto:humanresources@busqld.com.au).

We provide information to families and serviced schools about our child safe policies and practices by:

- Providing this Child Safety and Wellbeing Policy and Code of Conduct to our serviced school/s
- Publishing this Child Safety and Wellbeing Policy and Code of Conduct on our website.  
Creating culturally safe environments for Aboriginal children and their families

We are committed to creating an environment where Aboriginal children and families are welcomed and included. Strategies to embed cultural safety for Aboriginal children include providing training for staff on the strengths of Aboriginal culture and its importance to the wellbeing and safety of Aboriginal children.

Encouraging feedback from Aboriginal children and families on their experience of our service via the notice that we provide to parents/guardians, particularly how safe they feel expressing their identity including their culture.

## ***1.6 Valuing diversity***

We value diversity and equity for all children. To achieve this, we:

- provide training for management and staff on understanding diversity and equity, and how to support inclusion and cultural safety;
- welcome and support participation of all children, including children with disability, children from culturally and linguistically diverse backgrounds, those who are unable to live at home, LGBTIQ+ children and Aboriginal children and their families;
- have do not tolerate racism and other forms of discrimination and take action when discrimination or exclusion is identified.

## ***1.7 Code of conduct***

This Company has a Child Safe Code of Conduct. Its requirements will be communicated to all management and staff, and they must comply with it. Breaches of the Code of Conduct may result in disciplinary action including termination of employment.

## ***1.8 Employee recruitment***

Child safety and wellbeing is central to recruitment, including in any advertisements, and screening processes for staff. We only recruit staff who are appropriate to engage with children.

We require a Working with Children Check, and referee checks for all staff who have a role with children or have access to children's personal information. We require staff to have appropriate qualifications for their roles and check to make sure these qualifications are valid. Regular checks are made during a person's employment to ensure they remain valid.

Staff members likely to be inContact with children must also hold a valid Working with Children Check. (A National Police Check through Victoria Police is required as part of Victorian bus operator accreditation.)

## ***1.9 Employee support***

All management and staff receive training on induction, and as needed to ensure they understand their responsibilities in relation to child safety, including information and record keeping obligations, and to support their engagement with children.

Training will be recorded in the business's employee records system.

### ***1.10 Concerns, complaints and reporting***

If a staff member has any concerns, the staff member will record the reason and report the information promptly and confidentially to [humanresources@busqld.com.au](mailto:humanresources@busqld.com.au), who will notify the relevant person (for example, the school Principal). Should a staff member believe that a matter requires police attention they will advise [humanresources@busqld.com.au](mailto:humanresources@busqld.com.au) (and if school services, the Principal) and report the matter to the police.

All reports of child abuse and child safety concerns are treated seriously, whether they are made by an adult or a child and whether they are about the conduct of an adult or a child. Complaints and child safety concerns will be responded to promptly.

Our Complaint Handling Policy includes information about how a complaint or child safety concern will be responded to and the process to make a complaint, as well as the support available to those making a complaint and those involved in the complaint process.

If a complaint includes an allegation or incident of child abuse or harm, including racism, it must be reported in accordance with the complaint handling policy. All staff is required to prioritise children's safety in any response and to report all potentially criminal conduct to Victoria Police. Under the complaint handling and disciplinary policies, staff may be subject to actions to support child safety including:

- being stood down during an investigation or terminated following an investigation
- having their duties altered so they do not engage with children while at work
- not allowing unsupervised contact with children while at work
- removing their access to our IT system and facilities.

Complaints or concerns about child safety can be made at any time via the school, or via our email address [humanresorces@busqld.com.au](mailto:humanresorces@busqld.com.au).

### ***1.11 Record keeping***

The Company records child-related complaints or safety concerns which will be recorded confidentially in our X drive.

Records which may assist with the investigation of a complaint or safety concern will be identified and kept as part of the record of an investigation. Records will be kept even if an investigation does not substantiate a complaint.

We will record and keep the outcome of any investigations, and the resolution of any complaints. This includes findings made, reasons for decisions and actions taken.

Records will be stored securely and kept for a minimum of 6 years.

### ***1.12 Information sharing***

The Company may share relevant information to promote the safety and wellbeing of children, where it is lawful, appropriate and in their best interests. We will keep information about complaints confidential, except where it is necessary to share information to respond properly to a complaint or to prioritize child

safety. We may also need to share information about incidents or complaints with external authorities to comply with the law or to prioritize safety. More information is available in our Complaint Handling Policy.

### ***1.13 Risk management***

The Company recognizes the importance of identifying, preventing, and reducing risks of child harm and abuse. We conduct regular risk assessments and have a risk register (risk management plan) to address the risk of child abuse and harm. We will ensure that any risk controls put in place balance the need to manage harm with the requirements of contracted student transport. Management is responsible for approving the risk management plan. Staff are to comply with the risk management plan.

### ***1.14 Non-compliance with this policy and the code of conduct***

We will enforce this policy, the Code of Conduct and related child safety and wellbeing policies (see policies and procedures listed below). Alleged breaches by anyone will be investigated and may result in restriction of duties, suspension or termination of employment or engagement or other corrective action.

### ***1.15 Review***

The Company retains the absolute discretion to vary, replace or rescind the terms of this Policy from time to time, in accordance with the needs of the business. The terms of this Policy are not intended to impose legally binding obligations on the Pulitano Group and do not form part of any employee's contract of employment.

### ***1.16 Supporting documents – child safety and wellbeing system***

The following policies and procedures work together to support child safety and wellbeing across our operations:

- PG020 Child Safety and Wellbeing Policy
- Recruitment and screening process
- PG012 Disciplinary Policy
- Risk management plan
- Compliance Review checklist
- Child Safe Standards training plan
- DET School Bus Program, Policy and Procedures
- DET Students with Disabilities Transport Program, Policy and Procedures

### ***1.17 Supporting legislation***

- Child Wellbeing and Safety Act 2005 (Vic) (including Child Safe Standards)
- Children, Youth and Families Act 2005 (Vic) (including reporting to Child Protection)
- Crimes Act 1958 (Vic) (including Failure to Protect and Failure to Disclose offences)
- Wrongs Act 1958 (Vic) (including Part XIII – Organisational liability for child abuse)
- Bus Safety Act 2009
- Transport (Compliance and Miscellaneous) Act 1983



## 2 CHILD SAFETY STANDARDS COMPLAINT HANDLING POLICY AND PROCEDURE

The Company has developed a Complaint Handling Policy and Procedure to receive and manage complaints and safety concerns from stakeholders including schools, children and their families. These documents can be accessed by email from [humanresources@busqld.com.au](mailto:humanresources@busqld.com.au) or at the following weblink <https://www.cranbournetransit.com.au/policies>. It demonstrates our commitment to accountability, transparency, and continuous improvement.

The objective of this policy and procedure is to ensure that:

- stakeholders including children, are aware of and understand our complaint handling process;
- complaints are considered on their merits and investigated promptly and impartially with a balanced view of all information or evidence; and
- steps are taken to actively protect personal information.

In this policy, a complaint means any written or verbal expression of dissatisfaction about the actions of managers or staff in this Company in respect of children, including alleged breaches of the Company's Code of Conduct.

All allegations of child abuse and harm/child safety concerns will be treated seriously, whether they are made by an adult or a child and whether they are about the conduct of an adult or a child.

If a complaint includes an allegation or incident of child abuse or harm, it must be reported in accordance with this complaint handling policy.

If an allegation involves a criminal offense, it must be reported to Victoria Police. Criminal offences include grooming for sexual conduct with a child under the age of 16 years and failure to disclose a reasonable belief that a sexual offence has been committed by an adult against a child under 16 years of age unless they have a reasonable excuse for not disclosing or exemptions apply.

If any person in a position of authority within the Company becomes aware of a substantial risk that a child may become the victim of a sexual offence committed by an adult associated with the Company (for example, an employee or contractor), and they have the power or responsibility to reduce or remove the risk, then they must take all reasonable steps to do so. A person in authority who negligently fails to take appropriate action to address the risk may be charged with the criminal offence of failing to protect and may face a term of imprisonment.

If an adult reasonably believes a sexual offence has been committed by an adult against a child under the age of 16, they must report it to Victoria Police by calling 000 or going to their local police station. Failure to disclose the information may be a criminal offence.

All staff are required to cooperate with law enforcement in their investigation of any complaint.

If there is concern for the immediate safety of a child, immediately call 000.

### 2.1 How to make a complaint

Any complaints or concerns about child safety should be made to the School Principal or their authorized representative, and/or to the Company's People and Culture Manager by email to [humanresources@busqld.com.au](mailto:humanresources@busqld.com.au) or by phone 0488 699 955.

A complaint should include the name and contact number of the person making the complaint, and a clear statement of what the complaint is about.

If children make complaints or report any concerns to staff, these should be listened to and brought to the attention of [humanresources@busqld.com.au](mailto:humanresources@busqld.com.au)

## ***2.2 How a complaint or child safety concern will be responded to and investigated***

Complaints and child safety concerns will be responded to by People and Culture Manager.

The Company investigates all complaints by finding out the facts, speaking with the relevant people and verifying explanations where possible.

We will:

- acknowledge and address the complaint as soon as possible;
- ensure that complaints are handled confidentially in accordance with privacy and employment law obligations;
- take appropriate action to ensure the child is safe and cared for during the complaint procedure; and
- ensure that any action required to adequately address the complaint is taken promptly.

If you are not satisfied with our response, you may escalate the complaint to the Commission for Children and Young People telephone 1300 782 978; <https://ccyp.vic.gov.au/contact/> for further consideration.

## ***2.3 Outcomes***

Under PG0012 Disciplinary Policy, staff may be subject to actions to support child safety including:

- being stood down with pay during an investigation or terminated following an investigation.
- having their duties altered so they do not engage with children while at work.
- not allowing unsupervised contact with children while at work.
- removing access to our IT system and facilities.

Contractors will be dealt with by corrective action on a case-by-case basis.

## ***2.4 Support and assistance available to those making a complaint***

Anyone seeking to make a complaint will be supported to do so.

Any child making a complaint will be given time and space to do so, so that their issue can be heard, and they will be asked if they wish to have another child or person with them at that time for support.

Any adult making a complaint may have a support person with them. Support persons can provide moral support for the complainant but must not involve themselves in the complaint by acting as advocates for the complainant.

The Employee Assistance program is available for confidential counselling for work related or personal concerns and they can be contacted on 1800 81 87 28.

## 2.5 Support for those involved in the complaint process

We will treat anyone subject to the investigation of a complaint objectively, and:

- inform them of any complaint about their actions;
- provide them with an opportunity to explain the circumstances;
- provide them with appropriate support; and
- update them on the complaint investigation and the outcomes.

## 2.6 Record keeping

Records will be created and kept in accordance with this policy.

## 2.7 Review process

The Company retains the absolute discretion to vary, replace or rescind the terms of this Policy from time to time, in accordance with the needs of the business. The terms of this Policy are not intended to impose legally binding obligations on the Company and do not form part of any employee's contract of employment.

# 3 CODE OF CONDUCT

We are committed to having a Company that is safe for all children where child abuse and harm are not accepted. Child safety is a priority under this Policy, and the prevention and reporting of abuse is supported and encouraged. All staff and contractors involved with our business are responsible for promoting the safety, wellbeing and empowerment of children. We recognise that discrimination can harm children and we treat all children with dignity and respect.

This Code of Conduct sets expectations about how staff and contractors should behave around children. This helps children engage safely with our Company.

Having behavioural standards to manage risks to children is important. The Code of Conduct identifies positive child safe behaviours that we ask staff and contractors to demonstrate. It also identifies behaviours that we consider unacceptable and not permitted in our Company.

Not following standards of acceptable and unacceptable behaviour is a breach of this Code of Conduct and may result in disciplinary or corrective action. Some behaviours on their own may not be a serious breach of the Code of Conduct but together may indicate a concerning pattern of behaviour that poses a risk to the safety of children. The standards of behaviour to be followed at all times are attached in the table below.

Any breach of this Code of Conduct must be reported to People and Performance Manager by emailing [humanresources@busqld.com.au](mailto:humanresources@busqld.com.au) or by phone to 0488 699 955. If a complainant is unable to utilise this process, then they can contact the CCYP on 1300 782 978; <https://ccyp.vic.gov.au/contact/>

Some breaches of this Code of Conduct may by law need to be reported to Victoria Police, or to the Commission for Children and Young People. Our Complaint Handling Policy provides more information about obligations to report matters to external authorities as well as describing protections and confidentiality provisions for anyone making a report. The Complaint Handling Policy can be obtained by email from [humanresources@busqld.com.au](mailto:humanresources@busqld.com.au). It is also available <https://www.cranbournetransit.com.au/policies>.

Staff who breach our Code of Conduct may be subject to disciplinary action. This can include increased supervision, appointment to an alternative role, or suspension/termination from the Company.

Should a contractor breach this Code of Conduct it will be dealt with by corrective action on a case-by-case basis.

If any person in a position of authority within our Company becomes aware of a substantial risk that a child may become the victim of a sexual offence committed by an adult associated with the Company (for example, an employee or contractor), and they have the power or responsibility to reduce or remove the risk, then they must take all reasonable steps to do so. A person in authority who negligently fails to take appropriate action to address the risk may be charged with the criminal offence of 'failing to protect' and may face a term of imprisonment.

If an adult reasonably believes a sexual offence has been committed by an adult against a child under the age of 16, they must report it to Victoria Police by calling 000 or going to their local police station. Failure to disclose such information may be a criminal offence.

**All staff must follow these standards of behaviour at all times. Contractors are required to follow the (\*) asterisked standards while on our premises or vehicles.**

- take all reasonable steps to protect children from abuse
- take disclosures of harm or abuse made by a child seriously
- \* raise concerns with management if risks to child safety are identified
- \* report and act on any concerns or observed breaches of this Code of Conduct
- participate in training on child safety and wellbeing
- \* treat all children and young people with respect, regardless of race, sex, gender identity, sexual orientation, language, religion, political or other opinion, nationality, cultural background, financial situation, disability or other characteristics
- consider the different needs of all children, support them to engage with our services and help them and their families feel included
- make Aboriginal children and families feel included and welcome and support Aboriginal children to express their culture and enjoy their cultural rights
- \* never be racist towards anyone and report any instances of racism I become aware of
- help our Company to be a place where people of all cultures feel safe and included
- listen to children and respond to them if they feel unsafe
- value children and young people's ideas and opinions
- promote friendships and encourage children and young people to support their peers
- \* report any conflicts of interest I have (such as an outside relationship with a child) that may affect my ability to perform my role
- \* respect the privacy of children and their families, including keeping all personal information confidential unless required by law to share it
- inform parents and carers if there are situations that need to be safely managed but are outside the boundaries of this Code of Conduct (such as driving a child to a performance or competition or undertaking one-on-one training sessions)
- \* comply with all relevant Australian and Victorian legislation and our child safe policies and procedures
- uphold children's rights and always prioritise their needs
- \* if a contractor, report any inappropriate behaviour to the operator or the appropriate authority
- \* report breaches of this Code immediately

**Staff must not do the following things. Contractors must not do the (\*) asterisked things.**

- \* condone or participate in illegal, unsafe, abusive or harmful behaviour towards children – this includes physical violence, sexual abuse, emotional or psychological abuse, grooming, neglect or sexual misconduct
- ignore or disregard any concerns, suspicions or disclosures of child abuse or harm
- \* exaggerate or trivialise child abuse issues
- \* use hurtful or offensive behaviour or language with children
- \* fail to report information to police if I know a child has been abused
- touch children in a way that is unnecessary or unsuitable and falls outside what is reasonable to assist a student with a temporary or permanent disability to board, travel or alight from the bus service
- \* persistently criticise and/or denigrate a child
- \* verbally assault a child or create a climate of fear
- \* offer children and young people alcohol, cigarettes or other drugs
- \* show children pornographic images
- \* share details of sexual experiences with a child
- \* use sexual language or gestures in the presence of children
- \* initiate unnecessary physical contact with children or do things of a personal nature that children can do for themselves
- \* develop 'special' relationships with specific children or show favouritism through the provision of gifts or unnecessary or unsuitable attention
- \* have unauthorised contact with children online, on social media or by phone
- \* take photographs, screenshots or share images of children that are not authorised by the school Principal or the Principal's representative (not related to CCTV)
- \* be alone with a child when there is no professional reason for doing so
- \* engage in babysitting, mentoring and/or tutoring a child out of work hours (without managerial approval for this kind of secondary employment)
- \* enter changing facilities without first knocking.
- \* fail to report breaches of this Code immediately