

# Child Safety Risks and Concerns Policy

## ONCALL

ONCALL/SACARE<sup>1</sup>'s vision is to be nationally recognised as the leading integrated community service provider, empowering people to live their best lives. ONCALL is steadfastly focused on quality service that puts the client at the centre, is enabled through technology transformation, and delivered by people who are committed.

Quality and compliance are embedded into our daily actions and behaviours. ONCALL's policies and procedures provide the foundation and framework for our work and actions to ensure we provide best practice service quality and compliance. All staff are required to know and apply ONCALL policies and procedures that apply to their work.

## Policy Purpose

This policy aims to reiterate ONCALL's commitment to the safety of all children and young people we support and identify requirements for reporting suspected or alleged abuse.

## Policy Scope

This policy applies to all ONCALL staff, management and Board members, students, volunteers, consultants, and contractors. The policy applies to all facets of ONCALL governance and operations including, but not limited to, Board responsibilities, management decisions and business operations enabling or delivering services to clients.

## Policy Statement

### Mandatory Reporting

Although everyone has a moral responsibility to report concerns about child abuse, some professionals are legally required to make a report to Child Protection Services. For example, teachers, principals, doctors, nurses, midwives, police, youth workers, social workers and psychologists are mandated to report concerns of child abuse to Child Protection Services.

The obligation to report arises when a person is such a professional, and in practicing his or her profession, forms the belief on reasonable grounds that a child needs protection. A report must be made where there is a reasonable belief a child has suffered or is likely to suffer significant harm as a result of physical injury or sexual abuse and the child's parents have not protected or are not likely to protect, the child from that harm. It is a criminal offence to fail to do so. The report must be made as soon as practicable to Child Protection Services.

### Victoria

ONCALL staff are obligated to report any abuse to any child, whether or not supported by ONCALL to the Commission for Children and Young People. The report must occur within one day of becoming aware of any incident or allegation involving:

- a sexual offence
- sexual misconduct
- physical violence
- behaviour causing mental harm or neglect to a child
- ONCALL must then investigate the allegations

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<sup>1</sup> ONCALL is inclusive of the following entities - ONCALL Group Australia; Ablecare Pty Ltd trading as ONCALL; SACARE Pty Ltd. Throughout this document, ONCALL/SACARE will be referred to as ONCALL.

In ONCALL's residential Out of Home Care program, any incident or allegation of abuse must be reported via the Victorian Department of Families, Fairness and Housing's incident reporting system (CIMS).

#### National

All allegations of abuse must be reported to the state Police agency for investigation.

ONCALL staff who witness any form of suspected abuse or have any concern that a young person may be suffering abuse in any area of their lives have a moral obligation to report said abuse to their manager, regardless of legal obligation. The manager will then identify if reporting externally is required. ONCALL's Quality and Compliance team will assist in assessing external reporting/investigation requirements.

The safety and wellbeing of children is our primary concern. In acting on this concern, ONCALL will use fair procedures when making decisions that affect a person's rights or interests.

Individuals who are subject of an allegation which ONCALL is investigating will be afforded:

- the opportunity to respond
- an unbiased decision maker
- decisions based on evidence

We record all allegations of child abuse, child exploitation and inappropriate behaviour relating to children, including investigation information, in a secure manner.

#### Privacy, Confidentiality and Protections

ONCALL fosters a culture of disclosure and learning. ONCALL will provide protections so that anyone who provides feedback, or a complaint may do so confidentially and without fear of intimidation, victimisation, disadvantage, or reprisal. In matters of the disclosure of misconduct ONCALL provides for Whistleblower protections (Refer *Whistleblower Policy*).

#### Grooming for Sexual Conduct with a Child Under the Age of 16 Years

Many perpetrators of sexual offences against children purposely create relationships with victims, their families, or carers to create a situation where abuse can occur. This may be a criminal offence called grooming.

The offence of grooming occurs when a person over 18 years of age communicates, by words or conduct, online or face-to-face, with a child under the age of 16 years or with a person who has care, supervision, or authority for a child, with the intention of facilitating the child's engagement in or involvement in a sexual offence with that person or another person over the age of 18 years.

It is important to note that children or young people can also groom other children and young people.

Grooming, conducted online or over the internet, may include but is not limited to:

- asking a child inappropriate or personal questions
- sending a child offensive, confronting or obscene content
- asking a child to send intimate pictures or do things online that make them feel uncomfortable
- singling a child out for a 'special' relationship

If it is found that any ONCALL staff member or representative is reasonably suspected of engaging in online grooming or cyberbullying, ONCALL may act in accordance with the *Social Media Policy*.

#### Responding to a Child Disclosing (or Suspected) Incident/s of Abuse

- It is important that ONCALL staff provide a supportive environment for children, personnel, or families of children to report allegations of abuse or child safety concerns
- When a child approaches you to make a complaint or raise a concern in relation to child abuse, try and separate them from others discreetly and listen to them carefully. It is important to do so in a way that makes them feel safe
- If a child approaches you, let the child use their own words to explain what has occurred

- It is important that you reassure the child that you will take what they are saying seriously, and that you confirm that it is not their fault and that they are doing the right thing to seek help
- Never blame or interrogate the child if an issue of abuse or suspected abuse is raised
- Explain to the child that this information may need to be shared with others, such as with their parent/carer, specific people in your organisation, or the police or child protection services
- Do not make promises such as promising not to tell anyone about the incident, except that you will do your best to keep them safe
- Do not leave the child in a distressed state. If they seem at ease in your company, stay with them and arrange for them to go to another place where they feel safe
- As soon as possible after the disclosure, record the information using the child's words and report the disclosure to your manager who will make recommendations about mandatory reporting requirements, and how best to support the child. They will also make recommendations about whether an investigation should be carried out in accordance with the *Code of Conduct*

## Reporting Allegations

ONCALL takes all allegations (current and historic) of child abuse and child exploitation seriously and is committed to:

- providing processes for reporting allegations of child abuse and child exploitation
- ensuring thorough and quick investigation/ referral where required
- maintaining adequate record keeping of reports of alleged child abuse, child exploitation and child safety concerns
- our individuals knowing what to do and who to tell if they observe child abuse, child exploitation or if they notice inappropriate behaviour towards children; and
- the responsibility of reporting an allegation of child abuse or child exploitation to appropriate authorities if we have a reasonable belief that an incident took place

## Good Faith Reporting

It is not unprofessional conduct for a report to be made in good faith. The law generally protects those that report in good faith from legal repercussions and in some cases also prevents the disclosure of the name or any information likely to lead to the identification of the person who has made a report. ONCALL staff should feel it is safe for them to make a good-faith report relating to alleged child abuse, child exploitation and/or child safety concerns where they are legally obliged to do so.

## When and What to Report

Concerns must be reported as soon as practical.

Individuals must report when they observe or suspect that a child is or has been the subject of abuse, including physical violence, sexual abuse, serious emotional or psychological abuse and serious neglect.

A suspicion may exist if:

- a child tells an individual of conduct that could constitute abuse or neglect; or
- a child displays indicators of abuse or neglect and there is no other satisfactory explanation

Staff are also required to report general concerns such as:

- physical environment risks to children
- inadequate staff-child ratios (where relevant)
- breaches of the Code of Conduct (Child Safe Standards)
- feeling uncomfortable about interactions between an adult and a child
- observations of concerning changes in the child's behaviour

## How and Who to Report to

Reports of suspected or alleged abuse must be disclosed immediately to the line manager and via an internal incident report.

In an emergency or where it is believed that there is an immediate risk to the child's safety, emergency services should be immediately contacted on 000. Staff should also report to their manager and complete an internal incident report immediately.

Communications will be treated according to privacy procedures and shared on a 'need-to-know basis.'

## Maintaining Records

ONCALL will maintain records of any child safety complaints, disclosures or breaches of the Code of Conduct and store these records in accordance with security and privacy requirements.

## Breaches of this Policy

The breach of this policy by a team member, director or officer of the company may lead to disciplinary action being taken in accordance with the company's disciplinary procedure. Serious breaches may be regarded as gross misconduct.

All team members, directors and officers of the company will be expected to cooperate fully in any investigation into suspected breaches of this policy or any related processes or procedures. If an issue is identified with a supplier, we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period. We reserve the right to terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

## Related Documents

### Policy, Procedure, Manual

Child Safety Framework  
Client Incident Management Policy  
Feedback and Complaints Policy  
Freedom from Abuse and Neglect Policy  
Social Media Policy  
Staff Code of Conduct  
Whistleblower Policy

### Legislation

Child Wellbeing and Safety Act 2005 (Vic)  
Convention on the Rights of the child 1989 (UN)  
Human Rights Commission Act 1986 (Cth)

### Other (External)

National Principles for Child Safe Organisations  
Victorian Child Safe Standards  
Reportable Conduct Scheme

## Document Control

### Approval and Review

<b>DOCUMENT OWNER</b>	Audit Compliance and Risk Management Committee (ACRM)		
<b>APPROVAL DATE</b>	October 2023	<b>REVIEW DATE</b>	October 2025

### **Access and Feedback**

This policy will be made available to all staff on the ONCALL intranet and ONCALL database (Periscope), and to directors in the ONCALL Board orientation.

Users should provide comments and feedback on the accuracy, currency, and useability of the policy document to [AskQuality@oncall.com.au](mailto:AskQuality@oncall.com.au).