



Child Safe Reporting

Policy Title	Child Safe Reporting
Policy version	V1
Review Cycle	Annually
Last Review Date	
Implementation Date	July 2026
Next Review Date	July 2027

Policy Statement

SHARE OOSH is committed to maintaining a child safe environment where concerns about the safety, welfare or wellbeing of children are identified, documented and reported promptly and in accordance with legal and regulatory requirements.

We believe that children's safety, rights, and best interests are the paramount consideration for all Service operations, decisions and functions. Our OSHC Service ensures that child safety, wellbeing and best interests take priority over all other considerations, including financial interests or other obligations of management, and are embedded in our daily practices, policies and procedures.

All educators, staff members, students and volunteers at SHARE OOSH have a responsibility to act when they become aware of an incident, allegation, disclosure or concern that may affect a child's safety or wellbeing. Educators and relevant staff members are mandatory reporters under the Children and Young Persons (Care and Protection) Act 1998 (NSW) and have a legal obligation to report when they form reasonable grounds to suspect that a child is at risk of significant harm.

SHARE OOSH recognises that safeguarding concerns may arise through incidents occurring at the Service, disclosures made by children, observations of possible abuse or neglect, or allegations involving staff or volunteers. The Service will respond to such concerns in accordance with the Education and Care Services National Law and Regulations, the Children and Young Persons (Care and Protection) Act 1998 (NSW), and the NSW Child Safe Standards.

Reporting processes at SHARE OOSH support staff to fulfil their legal and ethical obligations while ensuring that information is managed sensitively and in the best interests of children. In some circumstances, the service will seek advice from relevant authorities before notifying families to ensure that a child's safety is not compromised and that any investigation is not interfered with.

Through clear reporting processes, staff training and leadership oversight, SHARE OOSH ensures that all safeguarding concerns are managed transparently, responsibly and in the best interests of children.

Definitions

Allegation	A claim or statement that a person has engaged in conduct that may have harmed a child, placed a child at risk of harm, or breached child protection laws or standards.
Approved Provider	The individual or organisation that holds legal responsibility for the operation and management of an education and care service under the Education and Care Services National Law.
Child Protection Concerns Register	An internal service record used to document and monitor safeguarding concerns, disclosures, or allegations relating to the safety, welfare or wellbeing of children.
Child Safe Standards (NSW)	A set of standards established by the NSW Government to guide organisations in creating and maintaining child safe environments and cultures that prioritise the safety and wellbeing of children.
Child Safety Concern Report	The internal written record used by SHARE OOSH to document a safeguarding concern, allegation, disclosure or observation relating to a child's safety or wellbeing.
ChildStory Reporter	The secure online reporting tool provided by the NSW Department of Communities and Justice that allows mandatory reporters to submit child protection reports electronically.
ChildStory Reporter Community	An online information and support platform for mandatory reporters that provides guidance, resources and training about child protection reporting in NSW.
Department of Communities and Justice (DCJ)	The NSW Government department responsible for child protection and for receiving reports where a child is suspected to be at risk of significant harm under the Children and Young Persons (Care and Protection) Act 1998 (NSW).
Disclosure	Information provided by a child indicating that they have experienced abuse, neglect or harm, or that they feel unsafe.
Educator	An individual who works directly with children in an education and care service and is responsible for providing education and care in accordance with the National Law and National Regulations.
Immediate Risk of Significant Harm (IROSH)	A situation where a child appears to be in immediate danger of serious harm and urgent action is required, including contacting emergency services or the Child Protection Helpline.
Inappropriate Conduct	Conduct that a reasonable person would consider inappropriate in an education and care service, as defined under Section 5AA of the Children (Education and Care Services) National Law (NSW). It includes behaviour inconsistent with professional standards, likely to cause harm,

or having violent or sexual connotations. A child's consent is not relevant in determining whether conduct is inappropriate.

Inappropriate Discipline	The use of discipline that is prohibited under the Education and Care Services National Regulations, including corporal punishment or discipline that humiliates, frightens or threatens a child (Regulation 155).
Mandatory Reporter	A person who delivers education, health care, welfare, residential or law enforcement services to children and who is legally required under the Children and Young Persons (Care and Protection) Act 1998 (NSW) to report when they have reasonable grounds to suspect a child is at risk of significant harm.
Mandatory Reporter Guide (MRG)	A decision-making tool developed by the NSW Department of Communities and Justice to help mandatory reporters determine whether a child protection report should be made.
Maltreatment	Abuse, neglect or other harmful treatment of a child that negatively affects their safety, wellbeing or development.
National Quality Agenda IT System (NQA ITS)	The national online system used by Approved Providers to submit notifications and information to the Regulatory Authority under the Education and Care Services National Law and Regulations.
National Worker Register	A national register established under the National Law for ECEC worker information, with obligations on Approved Providers to provide/update information as required.
Natural Justice / Procedural Fairness	A legal principle that ensures a person who is the subject of an allegation is treated fairly, informed of the allegation, and given an opportunity to respond before decisions affecting them are made.
Nominated Supervisor	A person designated by the Approved Provider who has day-to-day responsibility for the management and operation of the education and care service in accordance with the National Law and National Regulations.
NSW Police Force	The law enforcement agency responsible for investigating criminal offences, including offences relating to harm or abuse of children.
Office of the Children's Guardian (OCG)	The NSW Government agency responsible for administering the Working With Children Check and the Reportable Conduct Scheme.
Reasonable Grounds	The standard used in child protection reporting that refers to the level of suspicion formed when a reasonable person, given the available information, would believe that a child may be at risk of harm.

Regulatory Authority (NSW Early Learning Commission)	The independent NSW regulator responsible for monitoring and enforcing compliance with the Education and Care Services National Law and Regulations for education and care services.
Reportable Allegation	An allegation that a worker has engaged in conduct that may constitute reportable conduct under the NSW Reportable Conduct Scheme.
Reportable Conduct	Conduct by an employee, volunteer or contractor that involves harm to a child or misconduct that may pose a risk to children, as defined under the Children's Guardian Act 2019 (NSW).
Reportable Conviction	A criminal conviction that relates to conduct which may pose a risk to children and is subject to reporting under the NSW Reportable Conduct Scheme.
Responsible Person	A person who is placed in day-to-day charge of an education and care service in accordance with the Education and Care Services National Regulations when the Nominated Supervisor is not present.
Risk of Significant Harm (ROSH)	A threshold used in NSW child protection law indicating that a child may be experiencing abuse or neglect of a seriousness that requires a report to the Department of Communities and Justice under the Children and Young Persons (Care and Protection) Act 1998 (NSW).
Serious Incident	An incident that meets the definition of a serious incident under Regulation 12 of the Education and Care Services National Regulations and must be notified to the Regulatory Authority through NQA ITS.
Working With Children Check (WWCC)	A screening process conducted by the Office of the Children's Guardian that assesses whether a person is suitable to work with children.

National Quality Standard (NQS)

QUALITY AREA 2: CHILDREN'S HEALTH AND SAFETY		
2.2	Safety	Each child is protected.
2.2.1	Supervision	At all times, reasonable precautions and adequate supervision ensure children are protected from harm and hazard.

2.2.2	Incident and emergency management	Plans to effectively manage incidents and emergencies are developed in consultation with relevant authorities, practiced and implemented.
2.2.3	Child Safety and Protection	Management, educators and staff are aware of their roles and responsibilities regarding child safety, including the need to identify and respond to every child at risk of abuse or neglect

Legislative And Regulatory References

This policy operates within the framework of Australian and NSW legislation that governs child safety, protection and education and care services. It must be read in conjunction with the Education and Care Services National Law and Regulations, which set mandatory standards for ensuring children's health, safety and wellbeing.

Together with the [Children and Young Persons \(Care and Protection\) Act 1998 \(NSW\)](#), the [Children's Guardian Act 2019 \(NSW\)](#), the [Child Protection \(Working with Children\) Act 2012 \(NSW\)](#), and the [Crimes Act 1900 \(NSW\)](#), these instruments establish SHARE OOSH's legal obligations for creating a child safe environment and responding to concerns about harm or risk.

EDUCATION AND CARE SERVICES NATIONAL LAW	
3A	Paramount consideration
4	How functions to be exercised
5	Meaning of a serious incident
5AA	Meaning of inappropriate conduct
162A	Offence relating to child protection training
162B	Child safety training
165	Offence to inadequately supervise children
166	Offence to use inappropriate discipline
166A	Offence to subject child to inappropriate conduct (NSW)

167	Offence relating to protection of children from harm and hazards
174	Offence to fail to notify certain information to Regulatory Authority
174AA	Educators and other staff members of education and care service to notify certain information
174AB	Approved provider must notify Regulatory Authority of event under section 174AA
175	Offence relating to requirement to keep enrolment and other documents
188A	False or misleading information about certain notices
269B	National Early Childhood Worker Register
269E	Approved provider must give information to the National Authority for the National Early Childhood Worker Register
EDUCATION AND CARE SERVICES NATIONAL REGULATIONS	
12	Meaning of serious incident
84	Awareness of child protection law
86	Notification to parents of incident, injury, trauma and illness
87	Incident, injury, trauma and illness record
145	Staff records
149	Volunteers and students
155	Interactions with children
168	Education and care service must have policies and procedures
170	Policies and procedures to be followed

175	Prescribed information to be notified to Regulatory Authority
176	Time to notify certain information to Regulatory Authority
181	Confidentiality of records kept by Approved Provider

Related Policies

- Behaviour Guidance Policy
- Child Safeguarding and Professional Conduct Policy
- Governance and Management Policy
- Incident, Injury, Trauma and Illness Policy
- Management of Complaints Policy
- Providing a Child Safe Environment Policy
- Safe Use of Digital Technologies and Online Environments Policy
- Staffing Policy
- Supervision Policy

The following documents support the implementation of this policy and outline expectations for staff conduct and child safety practices at SHARE OOSH:

- Child Safe Code of Conduct
- Employee Handbook
- Statement of Commitment to Child Safety

Purpose

The purpose of this policy is to establish clear processes for identifying, documenting and reporting concerns about the safety, welfare or wellbeing of children attending SHARE OOSH.

This policy ensures that safeguarding concerns, allegations, disclosures and incidents are managed in a consistent and legally compliant manner in accordance with the Education and Care Services National Law and Regulations, the Children and Young Persons (Care and Protection) Act 1998 (NSW), and the NSW Child Safe Standards.

The policy provides guidance for educators, staff members, students and volunteers on:

- recognising and responding to safeguarding concerns
- documenting concerns and incidents appropriately
- escalating concerns through the service's internal reporting pathway
- meeting mandatory reporting and regulatory notification requirements
- maintaining appropriate confidentiality while prioritising the safety and wellbeing of children

This policy operates alongside the Child Safeguarding and Professional Conduct Policy, which outlines the standards of behaviour expected of adults working with children at SHARE OOSH. Together with other service policies that support a child safe environment, these policies contribute to a culture where concerns are taken seriously and addressed promptly in the best interests of children.

Scope

This policy applies to the Approved Provider and all staff of the Service including the Business Manager, Nominated Supervisor, Responsible Persons, educators, students, volunteers and visitors of the Service, and all families.

Guiding Principles

SHARE OOSH is guided by the following principles when responding to and reporting child safety concerns:

- **Child safety and wellbeing are paramount** – Decisions and actions prioritise the safety, welfare and wellbeing of children.
- **Children's voices are respected** – Children have the right to be heard and taken seriously. Disclosures or expressions of concern by children must be responded to with care, respect and appropriate action.
- **Safeguarding is a shared responsibility** – All adults working or volunteering at the service share responsibility for recognising and responding to concerns about children's safety and wellbeing.
- **Reporting processes support accountability and protection** – Clear and consistent reporting processes ensure that safeguarding concerns are documented, escalated and referred appropriately to protect children and uphold legal and professional responsibilities.
- **Allegations are managed with fairness and integrity** – Safeguarding concerns and allegations are handled in a manner that prioritises child safety while respecting confidentiality and principles of natural justice and procedural fairness.
- **Practice is guided by recognised child safety frameworks** – The service's approach to safeguarding and reporting is informed by recognised frameworks and standards including the [United Nations Convention on the Rights of the Child \(UNCRC\)](#), the [NSW Child Safe Standards](#), the [ECA Code of Ethics](#), the [My Time, Our Place Framework for School Aged Care](#), and relevant professional codes and regulatory guidance.

Procedures

1. Immediate Response to Safety Concerns

1. Where a child safety concern arises, staff must take immediate steps to ensure the child's safety and wellbeing. The safety, welfare and wellbeing of the child must be treated as the paramount consideration in all actions and decisions.
2. Where a child may be at risk of immediate harm, staff must act without delay to ensure the child is protected and seek appropriate assistance, including contacting emergency services where required.

3. Staff must remain calm, respond sensitively and provide appropriate reassurance to the child. When speaking with the child to gather information, Staff must not question the child in a way that may be leading or investigative.
4. Staff must not investigate child safety concerns themselves. Concerns must be reported and managed through the service's reporting procedures and relevant statutory authorities.
5. Staff must preserve relevant information and avoid actions that may compromise evidence or interfere with any future investigation.

2. Responding to a Disclosure

1. A disclosure may occur when a child directly or indirectly shares information about harm, or when information is provided by another child, family member or other person that raises a child safety concern.
2. Where a child makes a disclosure, educators must respond calmly and respectfully, ensuring the child feels heard, supported and taken seriously.
3. Staff must listen carefully and allow the child to speak freely. When gathering information about the disclosure, staff must not ask leading questions, pressure the child for additional information or attempt to investigate the concern.
4. Staff should reassure the child that they have done the right thing by speaking up and explain that the information will need to be shared with appropriate adults to help keep them safe.
5. Staff must not promise confidentiality to the child.
6. As soon as practicable after the disclosure, the staff member must report the concern in accordance with the service's internal escalation procedures and complete a Child Safety Concern Report.
7. Staff must document the disclosure as accurately as possible, including the child's words where known, recording only the facts. They must not include assumptions, interpretations or opinions.
8. Following a disclosure, the service will determine whether the concern may constitute a risk of significant harm (ROSH) and whether a report to the Department of Communities and Justice or other relevant authority is required.

3. Identifying Child Safety Concerns

Staff must remain vigilant to signs that may indicate a child safety concern. Concerns may arise through observations, patterns of incidents, information provided by others or changes in a child's behaviour or wellbeing.

Indicators of possible abuse, neglect or maltreatment may include, but are not limited to:

- unexplained injuries or repeated injuries
- injuries that are inconsistent with the explanation provided
- frequent absences or sudden changes in attendance patterns

- significant changes in behaviour, mood or emotional regulation
- withdrawal, fearfulness or unusually aggressive behaviour
- age-inappropriate sexualised behaviour or knowledge
- persistent hunger, poor hygiene or inadequate clothing
- signs of neglect such as untreated medical needs or lack of supervision
- a child expressing fear of a particular person or environment
- concerning interactions between a child and an adult.

Child safety concerns may also arise where a staff member observes behaviour by another staff member, volunteer, contractor or other adult that may constitute inappropriate conduct or inappropriate discipline.

The presence of one or more indicators does not necessarily confirm that abuse or neglect has occurred. However, staff must report any child safety concern in accordance with the service's reporting procedures so that the matter can be appropriately assessed.

Concerns that suggest a child may be at risk of significant harm (ROSH) must be escalated promptly so that statutory reporting obligations can be considered.

4. Internal Escalation Pathway

1. Where a staff member forms a child safety concern, they must immediately notify the Responsible Person on duty.
2. Upon receiving a report, the Responsible Person on duty must:
 - consider whether any immediate actions are required to protect the safety, welfare or wellbeing of the child, and
 - take appropriate steps to ensure the child is supported and safe while the matter is escalated.
3. The Responsible Person must provide the staff member with the opportunity and the direction to step away from direct supervision as soon as practicable to:
 - complete a Child Safety Concern Report, and
 - complete the [Mandatory Reporter Guide](#) (MRG) via the Childstory Reporter Community.
 - if the MRG outcome is "Report to the Child Protection Helpline", the staff member must select "e-report" and complete the formal report to DCJ. This report must be saved as a PDF and provided to the Nominated Supervisor.
4. The staff member must then provide the Child Safety Concern Report and completed MRG/e-report to the Nominated Supervisor immediately after completion.
5. The Responsible Person must complete a *Responsible Person Escalation Record* on the same day and send it to the Nominated Supervisor.

6. The Nominated Supervisor will notify the Business Manager including whether external reporting obligations apply.
7. Where the Nominated Supervisor is on leave, the Responsible Person must email the *Responsible Person Escalation Record* to both the Nominated Supervisor and the Business Manager and ensure the educator's *Child Safety Concern Report* is also provided to both the Nominated Supervisor and the Business Manager contact.
8. Where the concern relates to the conduct of the Responsible Person, the staff member must report the concern directly to the Nominated Supervisor and submit a *Reportable Conduct Concern Report*. Where the concern relates to the conduct of the Nominated Supervisor, the educator must report the concern and submit the report directly to the Business Manager.
9. Where ongoing adjustments to care, supervision or support are required, these will be communicated to relevant staff by the Nominated Supervisor or Business Manager as appropriate. Access to safeguarding records is restricted to authorised personnel on a need-to-know basis.

5. Recording the Concern

Child safety concerns must be documented promptly and accurately. *Child Safety Concern Reports*, *Responsible Person Escalation Records* and *Reportable Conduct Concern Reports* form part of the service's safeguarding documentation and inform the *Child Protection Concerns Register*.

- **Child Safety Concern Report:** Used by staff members when raising a child safety concern.
- **MRG Report:** All MRGs generated by staff regardless of the report outcome must be downloaded as a PDF and provided to the Nominated Supervisor to be recorded and stored securely.
- **Reportable Conduct Concern Report:** Used where a concern relates to the conduct of a staff member, volunteer, student, contractor, Responsible Person or any other worker associated with the service.
- **Responsible Person Escalation Record:** Completed by the Responsible Person following a concern being raised by a staff member.

Where an MRG is completed, the outcome must be recorded by saving the report as a PDF. Where a report is made to an external agency, the service must record and retain e-report details and the engagement number(s) for each report or notification.

Safeguarding documentation must be stored securely with access restricted to authorised personnel on a need-to-know basis.

Reports about worker conduct (including Reportable Conduct Concern Reports and any associated documentation) must be stored in the restricted file accessible only to the Nominated Supervisor, Business Manager, and Approved Provider.

Where immediate operational adjustments are required to support a child, these will be communicated to relevant staff by Management as appropriate.

These records must be maintained to support consistent documentation, monitoring and appropriate follow-up of matters relating to the safety and wellbeing of children while they are attending the service.

6. Child Protection Concerns Register

SHARE OOSH will maintain a Child Protection Concerns Register to support documentation, monitoring and appropriate follow-up of child safety concerns raised in relation to children attending the service.

The register is a central record of child protection concerns and must include, at a minimum, matters reported to:

- the NSW Office of the Children's Guardian (OCG)
- the NSW Department of Communities and Justice (DCJ)
- the Regulatory Authority (NSW Early Learning Commission)
- NSW Police.

The register must include notifications relating to serious incidents and complaints that must be notified to the Regulatory Authority, including matters relating to:

- serious incidents (National Law 174)
- inappropriate conduct (National Law 166A)
- negative notices (National Law 174AB).

The register is maintained by the Nominated Supervisor and the Business Manager and is stored securely with access restricted to these roles.

Entries must be made as soon as practicable following receipt of a *Child Safety Concern Report*, *Responsible Person Escalation Record*, *Reportable Conduct Concern Report*, or external report/notification.

As best practice, SHARE OOSH will also record child safety concerns that do not meet the threshold for external reporting in order to support pattern identification and early intervention.

The Child Protection Concerns Register will be used to inform ongoing monitoring, evaluation and continuous improvement, including updates to policies, procedures, training and risk management where required.

7. Determining External Reporting Requirements

Child safety concerns may require notification to one or more external authorities. Decisions about external reporting must prioritise the safety, welfare and wellbeing of the child as the paramount consideration.

The Nominated Supervisor (or the Business Manager when the Nominated Supervisor is on leave) will determine whether a report or notification is required, having regard to the information available, relevant legislation and government reporting tools and guidance.

Depending on the nature of the concern, reporting obligations may include:

- [Department of Communities and Justice \(DCJ\)](#) where there are reasonable grounds to suspect a child is at risk of significant harm (ROSH) (mandatory reporting)
- [Regulatory Authority \(NSW Early Learning Commission\)](#) where a serious incident or prescribed notification is required under the National Law and Regulations (via NQA ITS)
- [Office of the Children's Guardian \(OCG\)](#) where a matter involves an allegation, suspicion or conviction that may constitute reportable conduct
- NSW Police Force where there is suspected criminal behaviour or where a child may be in immediate danger.

In some matters, more than one report may be required. For example, a concern may require reporting to DCJ and the Regulatory Authority, or to the OCG and the Regulatory Authority.

Where the Nominated Supervisor or Business Manager is uncertain whether a report is required, the service will seek advice from the relevant authority and will document the steps taken and any advice received.

8. Mandatory Reporting to DCJ

Where a child safety concern suggests that a child may be at risk of significant harm (ROSH), a report must be made to the **NSW Department of Communities and Justice (DCJ)** in accordance with NSW child protection law.

The [Mandatory Reporter Guide](#) (MRG) via the [ChildStory Reporter Community](#) should be used to support decision-making about whether a concern meets the threshold for ROSH and whether a report to DCJ is required. The MRG supports, but does not replace, professional judgement.

Where the MRG outcome indicates ROSH (or where professional judgement identifies the need to report), a report will be made to DCJ using one or more of the following reporting pathways:

- **ChildStory Reporter Community** (eReport); and/or
- the **Child Protection Helpline** (132 111).

Reports must be made as soon as practicable after forming reasonable grounds to suspect ROSH, and within 24 hours. Where the concern indicates immediate risk, urgent action must be taken, including contacting emergency services and/or the Child Protection Helpline.

A staff member's mandatory reporting obligation is personal to them. Internal escalation to the Responsible Person, Nominated Supervisor, Approved Provider or another colleague does not remove that obligation. Where a staff member has raised a concern and another person advises that they will complete the MRG and/or make the report, the staff member must follow up and satisfy themselves that this has occurred. If they remain uncertain whether the required action has been taken, or if they continue to hold reasonable grounds to suspect that a child is at risk of significant harm, they must complete the MRG and make, or ensure the making of, a report without delay. A staff member may make a report to DCJ even if another staff member or senior employee does not share their concern.

Following a report to DCJ, SHARE OOSH will:

- record the outcome of the MRG;
- record and retain the report engagement number(s); and
- store all documentation relating to statutory reports securely with access restricted to authorised personnel.

Mandatory reporting to DCJ may occur alongside other notifications (for example, to the Regulatory Authority, the Office of the Children's Guardian, and/or NSW Police), depending on the nature of the concern.

9. Notifications to the Regulatory Authority (NSW Early Learning Commission)

SHARE OOSH must notify the **Regulatory Authority (NSW Early Learning Commission)** of prescribed matters in accordance with the Education and Care Services National Law and National Regulations.

Notifications to the Regulatory Authority are submitted via the National Quality Agenda IT System (NQA ITS).

The Approved Provider is responsible for ensuring notifications are made within required timeframes. Where notifications are required, they must be made as soon as practicable and within 24 hours in circumstances including (but not limited to):

- serious incidents (as defined in Regulation 12); and
- complaints alleging that a serious incident has occurred or that the National Law has been contravened; and
- any incident where the Approved Provider reasonably believes that physical or sexual abuse of a child has occurred or is occurring while the child is being educated and cared for by the service (or allegations of the same).

Where a notification is required, the Approved Provider (or authorised delegate) will log into NQA ITS and complete the relevant online form, including the I01: Notification of incident form and any required attachments.

The [National Decision Tree](#) may be used to support decision-making about whether a notification is required and the applicable timeframe.

Where the Nominated Supervisor is on approved leave and not to be contacted, the Responsible Person must escalate the matter to the Business Manager in accordance with [Section 4](#) to ensure notification obligations can be met within required timeframes.

Following any notification, SHARE OOSH will retain evidence of submission, including reference numbers and copies of lodged information, and record the matter in the Child Protection Concerns Register.

10. Reportable Conduct Scheme (Office of the Children's Guardian)

Where a child safety concern involves the conduct of a staff member, volunteer, student, contractor, Responsible Person, Nominated Supervisor, or any other worker engaged by SHARE OOSH, the matter may require action under the NSW Reportable Conduct Scheme administered by the **NSW Office of the Children's Guardian (OCG)**.

The Reportable Conduct Scheme applies to reportable allegations and reportable convictions involving a worker. Reportable conduct includes (but is not limited to) allegations of assault, ill-treatment, neglect, and sexual offences or sexual misconduct towards a child.

Concerns that may constitute inappropriate discipline or inappropriate conduct by a worker must be treated as a child safety matter and escalated immediately in accordance with Section 4. These matters may also require reporting under the Reportable Conduct Scheme.

Where a reportable conduct matter is identified, the Approved Provider is responsible for ensuring the matter is notified to the OCG within 7 business days.

Where a reportable conduct matter is raised, SHARE OOSH will:

- ensure immediate steps are taken to protect children, with the safety, welfare and wellbeing of children treated as the paramount consideration
- document the concern using a Reportable Conduct Concern Report
- ensure relevant evidence is preserved
- restrict access to information on a need-to-know basis
- manage the matter in a manner consistent with confidentiality and principles of natural justice and procedural fairness.

Where required, reporting under the Reportable Conduct Scheme may occur alongside other notifications (for example, to the Regulatory Authority via NQA ITS, to DCJ, and/or to NSW Police), depending on the nature of the concern.

11. Police Reporting

SHARE OOSH will contact NSW Police where a child safety concern indicates that a child may be in immediate danger, or where the matter may constitute a criminal offence.

Where there is an immediate risk to the safety of any person, emergency assistance must be sought by calling 000.

Where the matter is not an emergency, reports may be made to NSW Police by contacting or attending a local Police station. For general enquiries, staff may contact the Police Assistance Line on 131 444.

Matters that may require reporting to NSW Police can include allegations or suspicions of physical or sexual abuse (including grooming), assault, sexual offences, or other conduct that may constitute a criminal offence.

Reporting to NSW Police may occur alongside other required notifications to DCJ, the Regulatory Authority (NSW Early Learning Commission) and/or the Office of the Children's Guardian, depending on the circumstances.

Where police reporting is required, SHARE OOSH will document the actions taken, including any reference number provided, and store records securely in accordance with this policy.

12. Parent Notification

SHARE OOSH recognises that communication with parents and carers must be managed carefully in child safety matters. Parent notification must prioritise the safety, welfare and wellbeing of the child as the paramount consideration.

Where a child safety concern may involve statutory reporting or an external investigation, SHARE OOSH will consult with the relevant authority (for example, NSW Police, DCJ, the Regulatory Authority or the OCG) to understand what information can be shared and when, as this may impact any ongoing investigation.

Based on advice from the relevant authority, the service may be advised:

- not to contact a parent or carer (for example, where a parent or carer is alleged to have engaged in abuse); or
- to contact a parent or carer and provide agreed information as soon as possible.

Where parent notification is required under the Education and Care Services National Regulations (for example, in relation to an incident, injury, trauma or illness involving their child), SHARE OOSH will follow the service's Incident, Injury, Trauma and Illness procedures and ensure notification occurs within required timeframes, while still having regard to any advice from relevant authorities where child safety concerns are involved.

All parent communications relating to child safety concerns must be documented, including the date, time, method of contact, who was contacted, and a summary of information provided. Where parent notification is delayed or not undertaken based on advice, the advice received and rationale must be documented and stored securely.

13. Documentation and Evidence

All child safety concerns must be documented clearly, factually and objectively. Records must describe what was observed, heard or reported, and what actions were taken, without assumptions, opinions or investigative conclusions.

Where a disclosure is made, educators must record the child's words as accurately as possible and avoid asking leading questions or attempting to investigate the matter.

Staff must not conduct independent investigations into child safety concerns. Investigations and evidence-gathering are the responsibility of the appropriate authority.

All safeguarding documentation must be stored securely and treated as confidential. Access is restricted to authorised personnel on a need-to-know basis.

Where reports or notifications are made to external agencies (including DCJ, NSW Police, the Regulatory Authority or the OCG), the service must record and retain evidence of submission, including reference numbers and relevant correspondence.

Where relevant, the service must take reasonable steps to preserve evidence, including:

- retaining relevant documents and communications
- securing relevant records and device information where applicable
- ensuring information is not deleted, altered or shared inappropriately.

Documentation created under this policy (including the *Child Safety Concern Report*, *Responsible Person Escalation Record* and *Reportable Conduct Concern Report*) informs the Child Protection Concerns Register.

SHARE OOSH will handle safeguarding records and personal information in accordance with applicable privacy, confidentiality and record-keeping obligations, including the Privacy Act 1988 (Cth), the Education and Care Services National Regulations, and any other legislation that authorises or requires information sharing in child safety matters. Safeguarding records must be stored securely, access must be restricted to authorised personnel on a need-to-know basis, and information must only be used or disclosed where required for the education and care or medical treatment of the child, where authorised or required by law, or otherwise with appropriate consent.

Information sharing

SHARE OOSH may share information with other organisations involved in the child's safety, welfare or wellbeing (including the child's school) where permitted by law and where necessary to support the child's safety and care. Information will be shared on a need-to-know basis and in accordance with applicable information sharing provisions (including Chapter 16A of the Children and Young Persons (Care and Protection) Act 1998) and confidentiality requirements under the National Regulations.

Where a matter relates to reportable conduct, disclosure restrictions under the Children's Guardian Act 2019 apply and information will be managed accordingly.

14. Post-Incident Support and Review

Following a child safety concern, allegation, disclosure or serious incident, SHARE OOSH will provide appropriate support to children, families and staff as required, recognising that safeguarding matters can be distressing and may require follow-up over time.

Support may include, as appropriate:

- reassurance and wellbeing support for the child
- additional supervision or safety planning
- referral to external support services where appropriate
- support for staff involved, including access to guidance or debriefing.

Following critical incidents or significant child safety matters, SHARE OOSH will undertake a debrief and critical reflection process, ensuring privacy and confidentiality are maintained. The purpose of reflection is to identify improvements to policies, procedures, practices, training and risk management.

Where required, the service will review safeguarding controls and update relevant documents (including the Child Protection Concerns Register, risk management planning and staff training priorities) to support continuous improvement.

Roles and Responsibilities

ROLE	RESPONSIBLE FOR
Approved Provider	• Ensure the service maintains systems and processes that support the identification, documentation and reporting of child safety concerns in accordance with legislation and regulatory requirements. • Ensure the service complies with reporting obligations under the Education and Care Services National Law and Regulations and relevant child protection legislation. • Notify the Regulatory Authority and other relevant authorities where required. • Ensure allegations involving staff or volunteers are managed in accordance with the Reportable Conduct Scheme and other applicable legislation. • Maintain oversight of safeguarding reports and records, including the Child Protection Concerns Register. • Ensure appropriate information is provided to the National Early Childhood Worker Register where required. • Ensure staff receive training and guidance regarding their safeguarding and reporting responsibilities. • Ensure safeguarding concerns are managed in a manner that prioritises child safety while respecting confidentiality and principles of natural justice and procedural fairness.
Nominated Supervisor	• Implement this policy and ensure staff understand their responsibilities for recognising and reporting child safety concerns. • Ensure safeguarding concerns are escalated appropriately and managed in accordance with service procedures. • Ensure relevant authorities are notified where required in consultation with the Business Manager. • Maintain oversight of safeguarding documentation including the Child Safety Concern Report and Child Protection Concerns Register. • Ensure staff receive appropriate guidance and support when responding to disclosures, allegations or safeguarding concerns. • Ensure staff are aware of reporting tools and resources including the Mandatory Reporter Guide and ChildStory Reporter. • Promote a culture where safeguarding concerns are taken seriously and reported promptly.
Responsible Persons	• Ensure the immediate safety and wellbeing of children where a concern, disclosure or incident arises. • Receive and escalate safeguarding concerns raised by educators or staff. • Ensure the Nominated Supervisor is notified immediately of any safeguarding concern, allegation or disclosure.

	• Where the Nominated Supervisor is unavailable, escalate concerns to the Business Manager via the Committee President. • Ensure staff complete the Child Safety Concern Report as required. • Support staff in responding appropriately to safeguarding concerns.
Educators	• Remain vigilant to signs of abuse, neglect, maltreatment or other safeguarding concerns. • Respond appropriately to disclosures or concerns raised by children. • Immediately report safeguarding concerns to the Responsible Person or Nominated Supervisor. • Complete the Child Safety Concern Report in accordance with service procedures. • Fulfil their obligations as mandatory reporters under the Children and Young Persons (Care and Protection) Act 1998 (NSW). • Maintain confidentiality when handling safeguarding information. • Participate in child protection training and follow service policies and procedures relating to safeguarding and reporting.
Families	• Share relevant information with the service that may impact their child's safety or wellbeing where appropriate. • Raise concerns about the safety or wellbeing of children at the service with the Nominated Supervisor or Responsible Person. • Work collaboratively with the service where safeguarding concerns arise.
Other Staff	• Report any safeguarding concerns to the Responsible Person or Nominated Supervisor. • Follow service policies and procedures relating to child safety and reporting. • Maintain confidentiality when handling safeguarding information. • Participate in training or guidance relating to safeguarding responsibilities where required.
Students/Volunteers	• Immediately report any safeguarding concerns to an educator, Responsible Person or Nominated Supervisor. • Follow the service's policies, procedures and Code of Conduct relating to child safety. • Maintain appropriate professional boundaries with children. • Participate in induction processes that include child safety expectations.

Induction and Ongoing Training

SHARE OOSH is committed to ensuring all educators, staff members, students and volunteers understand their child safe reporting responsibilities and are supported to act confidently and lawfully when concerns arise.

Induction Requirements

Prior to being rostered as the responsible educator for an area or being counted in educator-to-child ratios, all staff, volunteers and students must be informed of:

- their reporting obligations under this Child Safe Reporting Policy and the Child Safeguarding and Professional Conduct Policy
- their responsibilities as mandatory reporters under NSW child protection law
- how to escalate concerns internally (including the requirement to report to the Responsible Person and submit a Child Safety Concern Report to the Nominated Supervisor on the same day)
- how to access and use relevant government reporting tools and guidance (including the Mandatory Reporter Guide and ChildStory Reporter where applicable)
- confidentiality expectations and appropriate information handling.

Ongoing Training and Capability Development

SHARE OOSH will ensure that educators and relevant personnel complete:

- required child safety training under the Education and Care Services National Law and Regulations; and
- accredited child protection training where required.

Ongoing training and professional learning will include:

- identifying child safety concerns and responding to disclosures
- recognising and responding to inappropriate conduct and inappropriate discipline
- using the Mandatory Reporter Guide and understanding ROOSH thresholds
- reporting pathways, timeframes and record keeping requirements
- maintaining confidentiality and implementing appropriate professional boundaries.

Refresher training will occur at intervals determined by legislation, regulatory guidance, risk assessment, incident trends or service review.

Training completion and currency will be monitored in accordance with the Staffing Policy.

Monitoring, Evaluation, and Review Process

SHARE OOSH is committed to continuous improvement in child safe reporting practice and to ensuring this policy remains current, effective and compliant.

Monitoring

The Approved Provider and Nominated Supervisor will monitor the implementation of this policy through appropriate governance and operational measures, which may include:

- periodic review of child safe reporting documentation (including *Child Safety Concern Reports*, *Responsible Person Escalation Records* and *Reportable Conduct Concern Reports*) to confirm appropriate escalation and record keeping
- oversight of the Child Protection Concerns Register to support follow-up and identify recurring themes
- monitoring timeliness of internal escalation and external reporting where required
- consideration of complaints, feedback and other information relevant to child safe reporting.

Evaluation

SHARE OOSH will evaluate the effectiveness of this policy using appropriate methods, which may include:

- reviewing whether staff understand and apply reporting pathways in practice
- reviewing whether reporting processes support timely escalation and appropriate external notifications
- assessing whether training and induction are supporting staff capability and confidence
- reviewing whether monitoring systems (including the Child Protection Concerns Register) support early identification of patterns and risks.

Findings from evaluation will inform updates to this policy and related procedures, training priorities and governance controls.

Review

This policy is reviewed at least annually, or earlier where:

- legislative, regulatory or government guidance changes
- incidents or compliance activities identify gaps in practice
- sector guidance recommends amendments
- the service identifies a need to strengthen clarity, systems or governance oversight.

Staff will be consulted as part of the review process and families will be invited to provide feedback.

Where changes to this policy may have a significant impact on the service's provision of education and care or families' ability to utilise the service, families will be notified in accordance with Regulation 172.

Updates to this policy will be endorsed by the Approved Provider/Management Committee and communicated to staff. Staff will be required to acknowledge updated versions where applicable.