



Providing a Child Safe Environment

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Policy Statement

SHARE OOSH is committed to providing and maintaining a child safe environment. In every decision, action and practice concerning a child, the child's safety, welfare, wellbeing, rights, dignity and best interests are the paramount consideration.

We are committed to fostering a culture of child safety that is preventative, responsive and accountable. This includes maintaining safe environments, promoting safe and professional conduct, reducing risks to children, responding appropriately to concerns, and ensuring child safety is supported through effective supervision, training, reporting processes and continuous improvement.

This policy sits within SHARE OOSH's broader child safe framework and is supported by the service's related policies and procedures concerning supervision, child safeguarding, reporting, staffing, incident response and digital technologies.

Definitions

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 Training

Training required under the Education and Care Services National Law to support relevant staff to understand and meet their child protection obligations, including identifying and responding to children at risk of abuse or neglect.

Child Safety Training

Training required under the Education and Care Services National Law to support educators, staff, students and volunteers to understand their responsibilities in maintaining a child safe environment, including recognising, preventing and responding to risks to children's safety and wellbeing.

Child Safe Environment	An environment where all reasonable steps are taken to protect children's safety, rights, dignity, wellbeing and best interests through safe supervision, appropriate conduct, risk management and effective response to concerns.
Child Safe Standards	A nationally consistent framework of 10 standards that guide organisations in creating and maintaining environments where children are safe, respected and empowered. In NSW, these are overseen by the Office of the Children's Guardian.
Cultural Safety	An environment where Aboriginal and Torres Strait Islander children and families feel respected, valued, and able to maintain their cultural identity and connections.
External Authority	A government body responsible for responding to or overseeing child safety concerns, including the NSW Early Learning Commission (Regulatory Authority), Department of Communities and Justice (Child Protection Helpline), NSW Office of the Children's Guardian, and NSW Police.
Inappropriate Conduct	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.
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.
Personal Electronic Device	Any mobile phone, smart watch, tablet, wearable device, camera or similar device that is not owned or managed by the service and is capable of capturing, storing or transmitting images or video.
Responsible Person	A Responsible Person is either the Approved Provider, a Nominated Supervisor, or a Person in Day-to-Day Charge who has been placed in charge of the service in accordance with the National Law. A Responsible Person must be present at the service at all times children are being educated and cared for.
Service-Issued Device	An electronic device purchased, supplied and managed by the service for authorised operational, administrative or approved reporting purposes.
Visitor	Any person on the premises who is not an employee, volunteer, parent or guardian collecting a child, including

contractors, tradespeople, external professionals (e.g. therapists) and community guests.

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

2.1.1	Wellbeing and comfort	Each child's wellbeing and comfort is provided for, including appropriate opportunities to meet each child's need for sleep, rest and relaxation.
2.1.2	Health practices and procedures	Effective illness and injury management and hygiene practices are promoted and implemented.
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, practised and implemented.
2.2.3	Child safety and protection	Management, educators and staff are aware of their roles and responsibilities to identify and respond to every child at risk of abuse or neglect.

QUALITY AREA 3: PHYSICAL ENVIRONMENT

3.1.1	Fit for purpose	Outdoor and indoor spaces, buildings, fixtures and fittings are suitable for their purpose, including ensuring safety and hazard prevention.
3.1.2	Upkeep	Premises, furniture and equipment are safe, clean and well maintained.

QUALITY AREA 4: STAFFING ARRANGEMENTS

4.1.1	Organisation of educators	The organisation of educators across the service supports children's safety and wellbeing.
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QUALITY AREA 5: RELATIONSHIPS WITH CHILDREN

5.1.1	Positive educator to child interactions	Responsive and meaningful interactions build trusting relationships which engage and support each child to feel secure, confident and included.
5.1.2	Dignity and rights of the child	The dignity and rights of every child are maintained.

QUALITY AREA 6: PARTNERSHIPS WITH FAMILIES AND COMMUNITIES

6.2.1	Engagement with families	Families are supported from enrolment to be involved in service decisions, ensuring clear communication of safety procedures.
6.2.2	Access and participation	Effective partnerships support children's access, inclusion and participation.

QUALITY AREA 7: GOVERNANCE AND LEADERSHIP

7.1.2	Management systems	Systems are in place to manage risk and enable the effective management and operation of a quality service.
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Legislative And Regulatory References

EDUCATION AND CARE SERVICES NATIONAL LAW

2A	Paramount consideration: safety, rights and best interests of children
162A	Child protection training
162B	Child safety training
165	Offence to inadequately supervise children
166	Offence to use inappropriate discipline
166A	Offence relating to inappropriate conduct
167	Offence relating to protection of children from harm and hazards
174	Offence to fail to notify serious incidents and complaints
Part 6A	Devices in education and care services
EDUCATION AND CARE SERVICES NATIONAL REGULATIONS	
82	Tobacco, drug, alcohol, vaping-free environment
83	Staff members not to be affected by alcohol or drugs
84	Awareness of child protection law
84A-84C	Requirements relating to child protection training and record keeping
97	Emergency and evacuation procedures
99	Children leaving the education and care service premises
100-102E	Excursions and regular outings
102AAB-102AAC	Safe arrival of children policies, procedures and risk assessments
103	Premises, furniture, and equipment to be safe, clean and in good repair

145	Staff record
155	Interactions with children
156	Relationships in groups
158-159	Children's attendance records
165	Record of visitors
166	Children not to be alone with visitors
167	Record of service's compliance
168	Education and care services must have policies and procedures
168(2)(h)	Policies and procedures to provide a child safe environment
170-176	Policies, procedures, record-keeping and notification requirements

Related Policies

- Behaviour Guidance Policy
- Child Safe Code of Conduct
- Child Safe Policy
- Child Safe Reporting Policy
- Confidentiality and Privacy Policy
- Delivery and Collection of Children Policy
- Digital Technologies and Online Environments Policy
- Excursions and Regular Outings Policy
- Governance and Management Policy
- Interactions with Children Policy
- Inclusion and Equity Policy
- Staffing Policy
- Statement of Commitment to Child Safety
- Supervision Policy

Purpose

The purpose of this policy is to ensure that SHARE OOSH provides a safe, healthy and supportive environment where all children are protected from harm. It sets out the service's commitment to creating spaces that are free from hazards and prohibited substances, and to establishing clear expectations for supervision, conduct, and the use of technology.

This policy supports:

- Compliance with the Education and Care Services National Law and Regulations.
- Consistent practices that protect children's physical and emotional wellbeing in both indoor and outdoor environments.
- A proactive approach to preventing harm, including the management of risks unique to the service's setting.
- The responsible use of technology in a way that safeguards children's privacy and dignity.
- Educator awareness of their legal obligations, including mandatory reporting requirements.
- A culture of vigilance, accountability and continuous improvement in child safety.

This policy also supports the cultural safety, connection and belonging of Aboriginal and Torres Strait Islander children and families by embedding culturally responsive practices and partnerships across the service.

Guiding Principles

SHARE OOSH is guided by the following principles in providing a child safe environment:

- **Children's safety comes first** – SHARE OOSH prioritises children's safety, welfare, wellbeing, rights and best interests in all decisions and maintains environments and practices that protect children from harm and hazards.
- **Respect, equity and inclusion** – Every child has the right to feel safe, respected and valued. Practices actively promote inclusion and cultural safety for all children and families.
- **Cultural safety and belonging** – SHARE OOSH acknowledges the rights of Aboriginal and Torres Strait Islander children to cultural safety, connection and belonging, and embeds culturally responsive practices in everyday operations.
- **Children's participation and voice** – Children are supported to express their views, contribute ideas and participate in decisions about their safety and wellbeing in age-appropriate ways.
- **Safe environments** – The service maintains a smoke-free, vape-free, alcohol-free and drug-free environment, and ensures that both physical and online spaces are safe and well-supervised.
- **Legal responsibilities** – All educators and management understand and act on their obligations under child protection legislation and mandatory reporting requirements.
- **Shared accountability** – Creating a child safe environment is a collective responsibility shared by educators, management, families and the community.

- **Continuous improvement** – Policies and practices are regularly reviewed and strengthened to reflect current legislation, sector guidance and the needs of children and families.

Procedures

To uphold this policy, SHARE OOSH will implement the following procedures:

1. Safe Premises and Equipment

- Conduct daily indoor and outdoor safety checks before each session, documenting hazards and actions taken.
- Conduct regular service-specific child protection risk assessments to identify and manage risks to children's safety, welfare and wellbeing across SHARE OOSH's routines, physical environments, transitions, excursions, visitor arrangements, supervision practices and online environments.
- Ensure all equipment and furniture is clean, well maintained, and safe for use.
- Remove or isolate any item, area or hazard that poses a risk until it can be repaired or made safe.
- Ensure cleaning materials, chemicals, medications and other dangerous substances are securely stored and inaccessible to children.

2. Substance-Free Environment

- Display clear signage indicating that the service is smoke-free, vape-free, alcohol-free and drug-free.
- Educators, families, visitors and contractors are prohibited from bringing or using vaping devices, cigarettes, alcohol or drugs on the premises or during excursions.
- Any breaches must be immediately reported to the Responsible Person and documented.

3. Technology and Photography

- SHARE OOSH manages the use of digital technologies, online environments, personal electronic devices and images of children in accordance with the Digital Technologies and Online Environments Policy.
- Personal devices are not permitted for use in program areas, except in an emergency or where expressly authorised under the Digital Technologies and Online Environments Policy.
- Service-issued devices must be used only for approved operational, administrative or reporting purposes, and must be stored and managed securely.

- Photographs or videos of children must not be taken, stored or shared except where expressly authorised under SHARE OOSH policy, such as documenting a severe injury for reporting purposes with approval from the Nominated Supervisor or Responsible Person.

4. Supervision and Outdoor Safety

- Educators must always maintain sight and sound supervision of children.
- Special consideration is given to SHARE's unfenced outdoor environment; exit points are to be actively monitored and educators positioned to maintain clear sightlines.
- Daily external safety checks of the park and outdoor areas must be completed before children enter, noting hazards and controls in the Daily External Safety Checklist.
- Educators must remain vigilant to risks introduced by members of the public, animals, or environmental hazards, and take immediate action to maintain safety.
- Educators ensure safe transitions between school and the service each day, maintaining sight and sound supervision from the time children arrive on school grounds until they are signed into the service.
- Attendance records, roll calls and head counts are used throughout each session to verify children's whereabouts, including during arrivals, departures, transitions, outdoor play, excursions, regular outings and emergency situations.
- Clear supervision zones and roles are established in the outdoor environment, ensuring exit points are monitored at all times.

5. Staff Recruitment and Suitability

- The Approved Provider verifies that all educators, volunteers and students hold a current WWCC before commencing at the service.
- Records of WWCC numbers, expiry dates and verification outcomes are maintained in staff files and reviewed regularly.
- Recruitment practices include reference checks and behavioural interview questions that assess alignment with the service's child safe values.
- Staff are inducted into the service's Child Safe policies and Code of Conduct before commencing unsupervised duties.

6. Visitor Management

- Visitors must sign in and out using the service's visitor register in OWNA whenever children are present.

- Visitors are never left alone with children under any circumstances. A staff member or Responsible Person must accompany visitors at all times while children are in attendance.
- External professionals engaged by families (e.g. occupational therapists, speech pathologists) may only work with a child during program hours if the child has been signed out of the service into the professional's care, with written authorisation from the parent or authorised nominee (e.g. via email, text, or OWNA message). The child must be signed back in immediately upon returning to the service.
- All visitors must read and sign the "Visitor Child Safe Briefing and Acknowledgement" form before commencing their first visit. This form outlines the service's expectations for conduct, confidentiality, and photography restrictions.
 - Signed forms are scanned and stored securely on the service's shared drive or visitor records file and reviewed annually, or sooner if the visitor's role or organisation changes.

7. Mandatory Reporting and Incident Response

- Staff who deliver education and care to children, and relevant service leaders, are mandatory reporters and must act if they have reasonable grounds to suspect that a child is at risk of significant harm.
- Staff must be familiar with and able to access the NSW Mandatory Reporter Guide and the NSW Early Learning Commission Reporting Guide to support timely, appropriate reporting decisions.
- Concerns must be raised immediately with the Nominated Supervisor or Responsible Person, who will guide internal escalation and documentation in accordance with the Child Safe Reporting Policy. This does not limit any person's right or obligation to report directly to an external authority where required.
- Child protection concerns are recorded in SHARE OOSH's secure Child Protection Concerns Register in accordance with the Child Safe Reporting Policy. Records include the concern raised, actions taken, reporting steps, relevant reference numbers, follow-up actions and closure or review notes.
- Child protection records are stored securely and accessed only by authorised persons. Any person who raises a child safety concern in good faith will be treated respectfully, supported where appropriate and protected from victimisation.
- Serious incidents, including allegations of abuse or harm, must be notified to the Regulatory Authority within 24 hours.
- Families will be informed of incidents in line with Regulation 86.

Families, staff, volunteers and visitors are encouraged to raise any child-safety concerns with the Nominated Supervisor in the first instance. Concerns will be managed in accordance with the service's *Management of Complaints Policy* and *Child Safe Reporting Policy*.

Individuals also have the right to report concerns directly to external authorities if they believe a child is at risk of harm or the service has not responded appropriately:

- **Department of Communities and Justice (DCJ)** – for concerns about abuse or neglect (Child Protection Helpline: 132 111).
- **NSW Department of Education (Regulatory Authority)** – for complaints or reportable incidents relating to breaches of the National Law or Regulations, including child safety or supervision.
- **NSW Office of the Children's Guardian (OCG)** – for concerns about the service's child-safe practices or staff behaviour under the Reportable Conduct Scheme.
- **NSW Police** – for allegations or incidents that may constitute a criminal offence.

8. Communication and Accountability

- Families are informed of the service's child safe environment measures through the Family Handbook, enrolment process and ongoing communication.
- Children are supported in age-appropriate ways to understand who they can speak to if they feel unsafe, worried, uncomfortable or need help, and are reassured that they will be listened to and taken seriously.
- Educators are expected to immediately report any unsafe practices, breaches of this policy, or hazards they cannot resolve themselves.
- The Management Committee will review hazard and incident records regularly to identify trends and ensure follow-up actions are completed.

Roles and Responsibilities

ROLE	RESPONSIBLE FOR
Approved Provider	• Ensuring the service has policies and procedures in place that meet legislative requirements for child safety. • Allocating resources to maintain safe premises, equipment, and practices. • Supporting the Nominated Supervisor and Responsible Persons to implement this policy consistently. • Monitoring compliance through regular policy reviews, audits and incident reporting. • Ensuring child protection records are securely stored, access is restricted, and concerns raised in good faith are handled without victimisation.
Nominated Supervisor	• Leading the implementation of this policy across the service. • Ensuring all educators are aware of their responsibilities regarding child safety, prohibited substances, technology use, and mandatory reporting. • Approving any authorised use of photography to document a severe injury and ensuring images are managed according to policy.

	• Overseeing incident reports and ensuring notifications are made to the Regulatory Authority within required timeframes. • Monitoring daily safety checks, hazard reports, and follow-up actions. • Maintaining oversight of the Child Protection Concerns Register and ensuring records are stored securely, reviewed appropriately and followed up in accordance with the Child Safe Reporting Policy.
Responsible Persons	• Acting on behalf of the Nominated Supervisor when on duty. • Ensuring compliance with this policy during their shift, including monitoring supervision, hazard controls, and safe environment practices. • Providing prior approval for authorised photography of a severe injury and ensuring the NS is informed as soon as practically possible. • Responding promptly to reported breaches of the smoke-free, vape-free, drug-free and alcohol-free requirements. • Supporting educators to maintain vigilance in SHARE's unique outdoor environment.
Educators	• Conducting daily safety checks and immediately reporting hazards. • Actively supervising children, including monitoring exits in the outdoor environment. • Complying with the prohibition on personal devices in program areas, except in emergencies. • Ensuring no photos of children are taken, unless explicitly authorised for severe injury documentation. • Maintaining awareness of mandatory reporting obligations and escalating concerns immediately to the NS or RP. • Modelling safe practices and reinforcing a culture of vigilance and respect. • Using attendance records, roll calls and head counts to confirm children are accounted for throughout the session. • Supporting children to raise concerns, ask for help and participate in discussions about safety in ways that are appropriate to their age and understanding.
Families	• Following service procedures when dropping off or collecting children to ensure safe transitions. • Respecting the service's smoke-free, vape-free, drug-free and alcohol-free environment. • Supporting safe use of technology by ensuring children's personal devices are not used during care and are stored in accordance with SHARE OOSH's Digital Technologies and Online Environments Policy. • Not taking photos or videos of children while at the service or in public spaces (e.g. the park) where the service is

	operating, to protect the privacy and safety of all children. Communicating any safety concerns to educators or management.
Other Staff	- Complying with all service safety requirements and maintaining smoke-free, vape-free, alcohol-free and drug-free conduct while on premises. - Reporting hazards or unsafe conditions to the NS or RP. - Maintaining confidentiality and respecting child safety practices while at the service.
Students/Volunteers	- Following the directions of supervising educators at all times. - Not using personal devices in program areas. - Supporting safe practices and immediately reporting hazards or safety concerns to educators. - Maintaining confidentiality and adhering to the service's child safe practices.

Induction and Ongoing Training

All new staff, volunteers and students are introduced to this policy during induction. Induction includes:

- Child safe environment requirements, including the smoke-free, vape-free, alcohol-free and drug-free policy.
- Prohibition on the use of personal devices in program areas and the conditions for authorised photography of severe injuries.
- Procedures for daily safety checks, hazard reporting, and incident documentation.
- Mandatory reporting responsibilities and how to escalate concerns.

Ongoing training is provided through:

- Regular policy refreshers at team meetings and professional development sessions.
- Updates when legislation, regulations or service practices change.
- Targeted training following incidents or identified gaps in practice.
- Staff sign-off on this policy is recorded at induction and following each review.

Monitoring, Evaluation, and Review Process

Monitoring

- The Nominated Supervisor and Responsible Persons check daily safety audits, hazard reports, and incident documentation to confirm compliance.
- Educators are expected to report hazards, breaches or unsafe practices immediately, which are logged and followed up by leadership.
- Child protection risk assessments are reviewed regularly, and sooner if an incident, concern, environmental change or change to service operations identifies new or increased risks.

Evaluation

- The Management Committee reviews incident, and hazard records each term to identify trends and assess whether risk controls are effective.
- Implementation of this policy is considered during team meetings, reflective practice discussions, and through feedback from staff and families.
- Observations of practice are used to confirm that staff are upholding the vaping ban, technology restrictions, and mandatory reporting responsibilities.

Review

- This policy will be formally reviewed at least every two years, or earlier if:
 - legislation or regulations change,
 - incidents highlight gaps in practice, or
 - sector guidance recommends amendments.
- All staff are consulted in the review process and families are invited to contribute feedback.
- Each review and staff sign-off is documented and endorsed by the Management Committee.

References and Resources

Legislation and Frameworks

- *Education and Care Services National Law (Sections 2A, 162A, 162B, 165–167, 166A, 174, Part 6A)*
- *Education and Care Services National Regulations (Regs 82–84C, 97–102E, 102AAB–102AAC, 155–159, 168(2)(h), 170–176)*
- *National Quality Framework and Guide to the National Quality Standard*
- *National Principles for Child Safe Organisations (2019)*

- *Children's Guardian Act 2019 (NSW)*
- *Working with Children Check (WWCC) requirements – NSW Office of the Children's Guardian*

Sector Guidance and Tools

- *ACECQA (2025) Policy and Procedure Guidelines: Providing a Child Safe Environment*
- *ACECQA (2025) Policy and Procedure Guidelines: Safe Use of Digital Technologies and Online Environments*
- *NSW Department of Education – Child Safe Standards Implementation Resources*
- *National Model Code for Taking Images and Videos of Children (2025)*
- *Office of the Children's Guardian (NSW) – Child Safe Organisations Resources Hub*
- *CELA and ELAA Policy Guides for Child Safe Practices*