Child Safety Policy

1. Purpose

Housing Choices Australia (HCA) is committed to the safety, wellbeing and rights of all children.

This Policy establishes HCA's commitments, principles, responsibilities and operational requirements for creating and maintaining child-safe environments, including ensuring compliance with applicable child safety legislation and standards across all jurisdictions in which HCA operates.

2. Application

This Policy applies to all HCA employees, Board members, contractors, consultants and volunteers (HCA People).

Governance documents support HCA people to live Our Values. They set out important controls that help keep people safe, manage organisational risk, and support compliance with legal and regulatory obligations.

All people to whom this document applies are expected to comply with it. Where non-compliance occurs, it will be managed in accordance with the organisation's performance management and disciplinary procedures.

3. Child Safety Commitments

HCA is committed to:

- Prioritising the safety, wellbeing and best interests of children in our decisions, services and organisational practices.
- Listening to and respecting the views of children and supporting them to participate in decisions that affect them in ways that are safe, age-appropriate and inclusive.
- Providing a culturally safe environment where Aboriginal and Torres Strait Islander children are respected, valued and supported to express their culture, identity and cultural rights. HCA does not tolerate racism, discrimination or behaviour that compromises cultural safety.
- Promoting equity, inclusion and safety for children from diverse backgrounds and for children with disability.
- Embedding child safety and wellbeing into organisational leadership, governance, risk management and continuous improvement activities.
- Maintaining recruitment, screening, induction, supervision and conduct processes that assess and ensure the suitability of HCA People.
- Providing ongoing child safety education, training and awareness to ensure HCA People recognise, prevent and respond appropriately to child safety concerns.

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- Maintaining safe physical, digital and online environments and identifying, assessing and managing risks that may affect the safety and/or wellbeing of children.
- Encouraging the identification and reporting of child safety concerns, incidents, complaints and allegations and responding to them promptly, appropriately and in accordance with legal obligations.
- Maintaining accessible, culturally safe feedback and child friendly complaints pathways that support children, families and communities to raise concerns.
- Monitoring and reviewing child safety practices to support continuous improvement and strengthen an organisational culture of safety and accountability at HCA.

4. Roles and Responsibilities

All HCA People have a responsibility to contribute to a child-safe environment and to comply with this Policy and applicable child safety obligations.

4.1 HCA People

Employees and Board members must:

- Promote the safety, wellbeing and rights of children.
- Maintain appropriate professional boundaries and demonstrate behaviour consistent with HCA's values and Code of Conduct.
- Recognise and respond appropriately to child safety concerns, disclosures, incidents and allegations.
- Comply with external reporting obligations and internal reporting requirements.
- Participate in required child safety training and awareness activities.
- Maintain confidentiality and privacy when handling child safety matters.
- Notify the HCA Responsible Officer, if a complaint or allegation regarding child safety has been made against them, including outside the normal course of their employment.

Contractors, Consultants and Volunteers must:

- Promote the safety, wellbeing and rights of children.
- Maintain appropriate professional boundaries and demonstrate behaviour consistent with HCA's values and Code of Conduct.
- Recognise and respond appropriately to child safety concerns, disclosures, incidents and allegations.
- Comply with reporting requirements, including notifying the primary HCA contact to allow external reports to be made.
- Participate in required child safety training and awareness activities.
- Maintain confidentiality and privacy when handling child safety matters.
- Notify their HCA main contact, if a complaint or allegation regarding child safety has been made against them, including outside the normal course of their work with HCA.

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4.2 People Leaders

People Leaders must:

- Support their employees to understand and comply with child safety obligations.
- Promote a culture where concerns are raised and acted upon appropriately.
- Support their employees in responding to and reporting child safety concerns.
- Ensure child safety matters are appropriately reported, escalated, documented and managed.
- Monitor compliance with this Policy within their areas of responsibility.

4.3 Chief Customer and Communities Officer

The Chief Customer and Communities Officer is accountable for oversight of this Policy, overseeing its effective implementation and ensuring HCA complies with applicable child safety legislation and standards across all jurisdictions in which HCA operates.

The Chief Customer and Communities Officer is also HCA's Child Safety Responsible Officer and will oversee all reports of child safety concerns, allegations, incidents and will initiate and oversee all reviews or investigations and ensure all agreed actions are implemented. If the report involves a HCA Person, the Chief Customer and Communities Officer will consult with the relevant Executive Leader and the Chief People Officer.

4.4 Chief People Officer

The Chief People Officer is responsible for ensuring HCA's child safety employment and workforce related policies and procedures comply with child safety legislation and standards across all jurisdictions in which HCA operates including:

- Recruitment and screening;
- Onboarding, induction and training;
- Employment-related risk management processes; and
- Employment-related responses to child safety concerns involving HCA People.

The Chief People Officer, and their team, will provide advice and support to leaders regarding workforce-related child safety matters and employment obligations, and will conduct ongoing reviews and improvement of workforce safeguarding controls. The Chief People Officer will also support the Chief Customer and Communities Officer if a Child Safety report involves a HCA person.

4.5 Safeguarding Specialist

The Safeguarding Specialist provides specialist advice and guidance regarding child safety obligations, reporting pathways, incident management, and continuous improvement activities. The Safeguarding Specialist also supports monitoring, review and continuous improvement of this Policy and associated documents.

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5. Child Safe Practices

5.1 Recruitment and Screening

HCA is committed to maintaining recruitment and screening practices that support the engagement of suitable people in roles that may involve contact with children.

For Board members, employees and volunteers, HCA will undertake appropriate pre-employment screening checks, as required by law in each jurisdiction and on the basis of assessed risk, including Working with Children Checks, National Police Checks and reference checks. HCA will make reasonable efforts to gather, verify and record information about a person's history of work involving children, including any history of complaints, allegations or disciplinary action, where deemed appropriate.

For contractors and consultants, HCA will require submission of appropriate screening checks, as required by law in each jurisdiction and on the basis of assessed risk, including Working with Children Checks, National Police Checks and reference checks.

HCA will take appropriate action where a person's suitability to work in child-connected environments is identified as a concern.

5.2 Child Safety Training and Awareness

HCA provides HCA People with information, training and resources to support child-safe practices on induction, annually, and whenever significant legislative, policy or procedural changes occur.

This includes recognising child safety concerns, understanding reporting obligations, responding appropriately to disclosures and concerns, and promoting culturally safe and inclusive interactions with children.

5.3 Safe Physical, Digital and Online Environments

HCA identifies, assesses and manages risks that may affect the safety and wellbeing of children in physical, digital and online environments:

- Maintaining safe workplaces and service environments;
- Implementing appropriate supervision and access controls;
- Managing risks associated with technology, social media and electronic communications; and
- Regularly reviewing child safety risks and implementing appropriate controls.

5.4 Complaints and Feedback

HCA maintains accessible and child-friendly complaints and feedback mechanisms that support children, families and communities to raise concerns safely.

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6. Recognising and Responding to Child Safety Concerns

HCA People are required to recognise and respond to child safety concerns that are identified through observations, disclosures, allegations, incidents, complaints, or information received from another person.

HCA People are not required to have proof that harm has occurred before taking action or reporting a concern. A reasonable belief or suspicion, based on the information available, is sufficient to initiate an appropriate response.

6.2 Immediate Response

Where a child is in immediate danger, police or emergency services must be contacted immediately.

6.3 Reporting

HCA People must report child safety concerns where there are reasonable grounds to suspect a child is experiencing harm or is at risk of harm, in line with all internal and external child protection reporting requirements in the jurisdiction in which they work in accordance with the Recognising and Responding to Child Safety Concerns Procedure.

6.4 Concerns Involving HCA People

Child safety concerns may involve the conduct, actions or omissions of HCA People. Any concern, allegation or report involving any HCA People must be escalated to the Chief Customer and Communities Officer and the Chief People Officer. Concerns involving HCA People must be managed in accordance with the Recognising and Responding to Child Safety Concerns Procedure and relevant People & Culture policies and procedures.

6.5 Organisational Response

HCA will take appropriate action in response to child safety concerns, disclosures, allegations and incidents to ensure the safety and wellbeing of children.

Led by the Chief Customer and Communities Officer, HCA will assess and investigate child safety concerns, disclosures, allegations and incidents in a timely, fair and trauma-informed manner, in accordance with relevant legal, regulatory and organisational requirements. Investigations may be conducted internally or by an appropriately qualified external investigator, depending on the nature, seriousness and complexity of the matter.

All investigations will be managed in a manner that:

- Prioritises the safety and wellbeing of children.
- Identifies and manages immediate and ongoing risks.
- Supports affected individuals and facilitates appropriate referrals where required.
- Complies with applicable legislative, regulatory and reporting obligations.
- Ensures procedural fairness, confidentiality and privacy.
- Maintains accurate and secure records in accordance with HCA's recordkeeping requirements.
- Identifies opportunities to strengthen child-safe practices, systems, culture and training.

Following an investigation, HCA will take appropriate corrective, disciplinary and/or preventative action where required, and monitor outcomes to support continuous improvement in child safety.

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7. Record Keeping and Privacy

HCA will:

- Maintain child safety records in approved organisational systems and in accordance with HCA's Records management Policy and applicable legal, regulatory, and organisational requirements, recognising that child safety records may require long-term retention to support safeguarding, accountability, and future investigations.
- Protect the privacy and confidentiality of children, reporters and other affected individuals, except where information sharing is required by law or to protect a child from harm.
- Ensure child safety information is only accessed by authorised persons who require the information to perform their role or fulfil legal obligations.
- Support accurate documentation of child safety concerns, decisions, actions and outcomes to assist accountability, risk management and continuous improvement.

8. Continuous Improvement

HCA monitors, reviews and learns from reports, incidents, complaints, audits and reviews to improve child-safe practices.

9. Exceptions

Exceptions are not permitted under any circumstances.

10. Implementation

This Policy is implemented through the following documents:

- Code of Conduct
- Recruitment and Selection Policy
- Recognising and Responding to Child Safety Concerns Procedure
- Feedback and Complaints Policy
- Records Management Policy
- Appeals Policy
- Privacy Policy

11. References

This Operational Policy should be read in the context of the following:

National

- National Principles for Child Safe Organisations.

South Australia

- *Child Safety (Prohibited Persons) Act 2016 (SA).*
- *Children and Young People (Safety) Act 2017 (SA).*

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- *Registration to Work with Vulnerable People Act 2013* (TAS).
- *Children, Young Persons and Their Families Act 1997* (TAS).
- *Criminal Code Act 1924 (TAS).*
- *Tasmanian Child and Youth Safe Organisations Act 2023* (TAS)

Victoria

- *Worker Screening Act 2020 (VIC).*
- *Child Wellbeing and Safety Act 2005 (VIC).*
- *Children, Youth and Families Act 2005 (VIC).*
- Child Safe Standards (VIC).

New South Wales

- *Child Protection (Working with Children) Act 2012* (NSW).
- *Children's Guardian Act 2019* (NSW).
- Child Safe Standards (NSW).

Western Australia

- *Working with Children (Screening) Act 2004 (WA).*
- *Children and Community Services Act 2004 (WA).*
- *Commissioner for Children and Young People Act 2026* (WA)

12. Definitions

Term	Definition
Child/Children	A person under 18 years of age
Child Safety Concern	Any concern, allegation, disclosure, suspicion, observation or incident that indicates a child may be at risk of harm or that their safety, wellbeing or protection may be compromised
Child Harm	Any act, omission or circumstance that causes or is likely to cause physical, sexual, emotional or psychological harm, neglect or exploitation.
Board Members	All non-executive Directors of HCA entities and all Member Directors of the Member Companies.
People Leaders	Employees who have responsibility for supervising, managing, directing, supporting and overseeing the work of other employees, contractors and volunteers. This includes managers, team leaders and any employee with day-to-day leadership, oversight or decision-making responsibilities in relation to others.
HCA People	Employees, board members, contractors, consultants and/or volunteers engaged by HCA to perform duties, provide services or otherwise benefit HCA.
Employees	Employees of Housing Choices Australia

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Contractor	An individual or organisation engaged by HCA under a contract to provide services, perform work, or deliver specific outcomes on behalf of HCA.
Consultant	An individual or organisation engaged by HCA to provide specialist advice, expertise, analysis, recommendations, or professional services.
Volunteer	An individual who performs unpaid work for the main purpose of benefitting HCA.

13. Document details

Title	Child Safety Policy
Version	v1.0
Approver	CEO
Owner	Chief Customer and Communities Officer
Approval date	27/10/2026
Review period	2 years

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English:

If you need an interpreter, please call TIS National on 131 450 and ask them to call **Housing Choices Australia** on **1300 312 447**. Our business hours are **9am to 5pm, Monday to Friday**.

You can also visit the TIS National website for translated information about the service TIS National provides. Visit: www.tisnational.gov.au

Arabic:

إذا كنت بحاجة إلى مترجم، يرجى الاتصال بـ TIS الوطنية على الرقم 450 131 وأطلب منهم الاتصال بـ **Housing Choices Australia** على هاتف رقم **1300 312 447**. ساعات العمل الخاصة بنا **9am to 5pm, Monday to Friday**.

يمكنك أيضا زيارة موقع TIS الوطنية للحصول على معلومات حول الخدمات التي تقدمها TIS الوطنية. قم بزيارة: www.tisnational.gov.au

Farsi (alt Persian):

اگر به مترجم نیاز دارید، لطفا با شماره تلفن تیس نشنال 450 131 تماس بگیرید و از آنها بخواهید با **Housing Choices Australia** به شماره **1300 312 447** تماس بگیرند. ساعت کاری ما **9am to 5pm, Monday to Friday** است.

شما همچنین می توانید به وب سایت تیس نشنال برای اطلاعات در مورد خدماتی که تیس نشنال فراهم می کند مراجعه کنید. به www.tisnational.gov.au

Vietnamese:

Nếu quý vị cần thông dịch viên, xin hãy gọi cho Dịch vụ Thông Phiên dịch Quốc gia (TIS Quốc gia) theo số 131 450 và yêu cầu họ gọi cho **Housing Choices Australia** theo số **1300 312 447**. Giờ làm việc của chúng tôi là **9am to 5pm, Monday to Friday**.

Quý vị cũng có thể vào thăm trang mạng của TIS Quốc gia để có thông tin về các dịch vụ mà TIS Quốc gia cung cấp. Hãy vào thăm www.tisnational.gov.au

Somali:

Haddii aad u baahan tahay turjumaan, fadlan ka wac TIS National taleefanka 131 450 waxaad ka codsataa inay kuu wacaan **Housing Choices Australia** iyo **1300 312 447**. Saacadaha Shaqadu waa **9am to 5pm, Monday to Friday**.

Waxaad kaloo booqan kartaa website-ka TIS National ee macluumaadka turjuman oo ku saabsan adeegga TIS National ay bixiso. Ka eeg: www.tisnational.gov.au

Simplified Chinese:

如果您需要口译员，请拨打TIS National 的电话131 450，请他们打电话 给 **Housing Choices Australia**，电话号码：**1300 312 447**。我们的营业 时间是 **9am to 5pm, Monday to Friday**。

你也可以访问TIS National 的网站，了解TIS National提供的服务。网址： www.tisnational.gov.au

Traditional Chinese:

若你需要口譯員，請撥打TIS National電話131 450並請他們轉接 **Housing Choices Australia** 的電話 **1300 312 447**。我們的工作時間是 **9am to 5pm, Monday to Friday**。

你也可以瀏覽TIS National 網站瞭解TIS National 的服務資訊，網址：www.tisnational.gov.au

Spanish:

Si necesita un intérprete, por favor llame a TIS National en el 131 450 y pida que lo comuniquen con **Housing Choices Australia** en el **1300 312 447**. Nuestro horario de oficina es **9am to 5pm, Monday to Friday**.

También puede visitar el sitio web de TIS National para obtener información acerca de los servicios que provee TIS National. Visite www.tisnational.gov.au

Italian:

Se hai bisogno di un interprete, telefona a TIS National al numero 131 450 e chiedi di chiamare **Housing Choices Australia** al **1300 312 447**. I nostri orari d'ufficio sono **9am to 5pm, Monday to Friday**.

Puoi visitare anche il sito web TIS National per informazioni tradotte sul servizio che TIS National fornisce. Visita il sito: www.tisnational.gov.au

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