



Safeguarding Children Policy

1. Purpose

Our Commitment to Child Safety

Big Fat Smile is a child safe organisation, committed to ensuring and advocating for the safety and wellbeing of children entrusted to our care.

We demonstrate this commitment through embedding of the Child Safe Standards in culture, policies, procedures, and practice.

Big Fat smile has a zero tolerance for child abuse and harm and all allegations and safety concerns will be treated seriously and acted upon.

Our Cultural Safety Commitment

Big Fat Smile is also committed to Cultural Safety and strives to scaffold children for success through providing quality services

We recognise and respect Aboriginal and Torres Strait Islander Peoples as the Traditional Custodians of the Land.

We acknowledge the role we have in empowering future generations to connect with and be knowledgeable about Culture, Community and Country.

Big Fat Smile takes very seriously its moral, ethical, and legal obligations to act in the best interests of children, promote their wellbeing and to prevent, identify and respond to child injury, harm, abuse, or neglect.

The Big Fat Smile Child Safe Framework articulates the strong commitment that Big Fat Smile makes to safeguard children and their wellbeing. The framework focuses on four key requirements and guidance for implementation in line with the National Child Safe Framework and the NSW Child Safe Scheme.

The four key elements of the Big Fat Smile Framework are:

- Environment: Safe, Nurturing and Inclusive
- Culture and Purpose: Fostering Respect, Trust and Empowerment
- Capability: Building Knowledge and Skills for All
- Advocacy: Championing Children's Rights and Protection



The Big Fat Smile Child Safe Framework is further underpinned by the Look, Do, Tell Framework (for Safeguarding Children) provides a clear, framework for all staff to meet our obligations to prevent, identify and respond to child harm, abuse and neglect. We all have a responsibility to keep children safe. If you see something, if you hear something, you must say something

Other guidance that supports the purpose of the Safeguarding Children Policy includes National Law & Regulations (Early Childhood), Child Protection Legislation and Schemes (Working with Children Check, Reportable Conduct Scheme) and other reporting obligations to the Police, Early Childhood Education and Care Directorate (ECECD) and Department of Communities and Justice (DCJ).

2. Scope

This policy and associated procedures apply to all Big Fat Smile workplace participants across education and care services, funded programs, inclusion services and all head office employees including the Board.

Under Section 84 of the National Regulations, all staff and volunteers are required to be aware of the existence and application of the current child protection law, and any obligations they may have under state and territory legislation. This relates to mandatory reporting laws in NSW as well as the NSW Reportable Conduct Scheme.

3. Key Principles under the Big Fat Smile Child Safe Framework

Environment

At Big Fat Smile we foster child-safe environments to ensure the protection, wellbeing, and development of children in a space that is free from harm, abuse, neglect, or any other forms of mistreatment.



Physical Environments: we have safe and secure spaces which are child-friendly, free from hazards, risks, or dangers, ensuring children can explore and play safely.

Cultural safety: Ensure that all staff are culturally competent and aware of the challenges Aboriginal and Torres Strait Islander children face, as well as understand culturally appropriate strategies for support.

Culture & Purpose

To create and sustain an organisational culture at Big Fat Smile that actively prioritises the safety, well-being, and rights of children. This means embedding child safety into everyday practices and environments where staff feel equipped and supported to Look, Do and Tell and where children are protected, respected, and empowered to have a voice in their protection.

Leadership and Governance: The board and senior leadership demonstrate a strong, visible commitment to child safety.

Child Safety is embedded in Big Fat Smile Vision, Values and Strategic Plan which help inform the Organisations Child Safe Action Plan.

Clear accountability and oversight: Governance structure define clear roles and responsibilities for child safety at all levels.

Capability

To ensure all staff, families are equipped with the necessary skills, knowledge, and resources to protect children from harm. We aim is to mitigate risks, comply with legal and regulatory requirements, and promote a child-safe culture.

National Principles and NSW Child Safe Standards set the groundwork for fostering a child-safe culture across our organisation and assists us to build capability by fostering an environment where child safety is a key priority.

Risk Management: Continue to monitor and review Big Fat Smile's Risk Management Strategy which identifies and manages the potential risk of harm or abuse to children in the organisation's care.

Advocacy

Our advocacy focuses on ensuring that children's rights are upheld within and beyond the organisation. It involves speaking out for children, ensuring their voices are heard, and pushing for changes that promote their safety and well-being.

Capacity Building: Big Fat Smile continues to partner with external stakeholders within each sector to build capacity and advocate for children and families.

Child Safe Action Plan: The action plan will serve as a part of the Big Fat Smile Strategic Roadmap to ensure that child safety is not just a theoretical commitment, but an active, ongoing process that is embedded into the organisation's daily operations, policies and practice

4. Roles and Responsibilities

Board of Directors	<ul style="list-style-type: none">• Approve the Child Safe Framework and oversee compliance with the NSW Child Safe Scheme through the organisation Child Safe Action Plan.
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	<ul style="list-style-type: none"> • Champion a child safe culture by role modelling the child safe principles and standards, ensuring child centric and child safe decisions, and advocating for child safety within and outside of the organisation. • Provide adequate resourcing to enable employees to effectively deliver on child safe frameworks, child safe action plans, risk mitigation strategies, initiatives, reporting requirements and legislative and regulatory compliance. • Board members are aware of the existence and application of the failure to protect, failure to disclose and duty of care requirements that apply to individuals and organisations, noting that it may be a criminal offence not to comply.
Chief Executive Officer and Executive Leadership Team	<ul style="list-style-type: none"> • Provide strategic support and guidance for Child Safe Scheme, Frameworks, and child safe initiatives. • Provide adequate resourcing to enable employees to effectively deliver on child safe frameworks, child safe action plans, risk mitigation strategies, initiatives, reporting requirements and legislative and regulatory compliance. • Oversee the development, implementation, monitoring, reporting and evaluation of policies to safeguard children and young people and report to the Board on these. • Provide regular updates to the Board on emerging risks and safeguarding themes from incidents, complaints, and investigations. • Promote the safeguarding of children and young people and an organisation-wide culture of safeguarding children. • Ensure the organisation maintains appropriate documentation and provide reports to the Board. • CEO (or delegate) to act as Head of Agency for reportable conduct allegations and convictions as required by the Children's Guardian Act 2019. • CEO to liaise directly (or appoint delegate) with the Office of the Children's Guardian regarding reportable conduct matters.
Safeguarding Team	<ul style="list-style-type: none"> • Provide safeguarding leadership to embed the organisation's Safeguarding Framework and Child Safe Action Plans and initiatives, this policy, associated procedures and relevant safeguarding and child protection legislation. • The role of the Big Fat Smile Child Wellbeing Specialist provides subject matter expertise to support staff learning, development and practice to help ensure currency of knowledge and practice in safeguarding children and child protection. • Provide safeguarding children guidance and advice for all relevant policies, procedures, and activities. • Provide ongoing updates to the Board on the Big Fat Smile Child Safe Action Plan. • Investigate and manage incidents in accordance with relevant policies and procedures. • Report to external authorities where required. • Liaise with the Office of the Children's Guardian, NSW Police and or Department of Communities and Justice where required. • Our Child Wellbeing Specialist provides case coordination to families that need additional support and linkages with universal services
Managers and	<ul style="list-style-type: none"> • Embed the Principles of the Big Fat Smile Child Safe Framework and the Look/ Do / Tell Framework



Direct Line Supervisors	<ul style="list-style-type: none"> • Embed and champion a child safe culture and the child safe standards within your service, program, portfolio, and teams. • Manage incidents in accordance with this and other relevant policies and procedures. • Ensure child safe behaviours are demonstrated and that all instances of unacceptable behaviour are reported and addressed.
All staff	<ul style="list-style-type: none"> • All staff adhere to the Child Safety and Wellbeing Standards of Behaviour in the Big Fat Smile Code of Conduct. • Commit to creating a child safe culture by adhering to the Big Fat Smile Look / Do / Tell Framework and ensuring service delivery and environments for all children and young people are safe through positive interactions and upholding the rights and dignity of children. • Model culturally safe, inclusive behaviours and practices. • Know your responsibilities in relation to preventing, identifying and responding to child harm, abuse, and neglect, and actions required as a mandatory reporter. • Immediately report any suspected child harm or abuse concerns or complaints to external authorities and internally as per the reporting obligations within this policy and related procedures. • Provide support to children and families within the scope of your role. This includes ensuring that children and families are aware of their rights, complaints processes, and how the organisation keeps them safe. • Ensure accurate records are kept and the confidentiality of private information relating to children's wellbeing or safety concerns is maintained. • Participate in induction and ongoing professional learning and be aware of responsibilities to children including information sharing and reporting obligations.

5. Active participation of children, families and communities

At Big Fat Smile we are committed to creating a child-safe environment by promoting the meaningful participation of children, families, and communities in our safeguarding practices. We recognise that collaboration and open communication are vital in identifying, preventing, and responding to risks to children's safety and wellbeing.

Child Participation and Voice

- Opportunities for children to express their views and concerns through age-appropriate consultations, surveys, suggestion boxes, and participation in decision-making forums.
- Our staff are trained to actively listen to and respect children's perspectives, and to respond appropriately and supportively.
- Feedback from children is used to inform and improve our programs and safety strategies.
- *Advocating for Children's Rights:* We actively promote and protect children's rights both within the organisation and in the wider community in line with the convention on the rights of the child. A key part of our child safe action plan includes ensuring that children's voices are respected and considered in decision-making.

Engaging Families and Carers



- Our Child Safe Commitment, Child Safe Framework and child-related policies and procedures are easily accessible on our Big Fat Smile website and offline for everyone who accesses our services and events, including children, parents, carers and community members.
- Big Fat Smile Policies and Procedures highlight how collaborative partnerships with families and communities are maintained and families are involved in decisions on their child's safety and wellbeing including learning and curriculum, cultural safety and inclusion
- Families are regularly invited to participate in workshops, forums, and information sessions about child safety policies and practices.

Respecting Diversity

- We are committed to being culturally safe and inclusive. Our practices are designed to reflect and respect the diverse backgrounds, needs, and experiences of children and families, including Aboriginal and Torres Strait Islander peoples, those from culturally and linguistically diverse communities, children with disability, and LGBTQIA+ children and families.
- We work with community leaders and cultural advisors to ensure our approaches are inclusive and respectful.

6. Definitions

Safeguarding refers to the proactive measures an organisation takes to promote the welfare of all children and protect them from harm, while **child protection** is a specific aspect of safeguarding that focuses on responding to concerns, disclosures, or incidents of abuse, neglect, or harm.

Types of Abuse

Psychological abuse (also known as emotional abuse)

This includes bullying, threatening and abusive language, intimidation, shaming and name calling, ignoring and isolating a child, and exposure to domestic and family violence.

Physical abuse

This includes physical punishment, such as pushing, shoving, punching, slapping and kicking, resulting in injury, burns, choking or bruising.

Sexual abuse

This includes the sexual touching of a child, grooming, and production, distribution or possession of child abuse material.

Grooming

This is a process where a person manipulates a child or group of children and sometimes those looking after them, including parents, carers, teachers and leaders. They do this to establish a position of 'trust' so they can then later sexually abuse the child.

Misconduct

This is inappropriate behaviour that may not be as severe as abuse but could indicate that abuse is occurring and would often be in breach of an organisation's Child Safe Code of Conduct. This could include showing a child something inappropriate on a phone, having inappropriate conversations with a child or an adult sitting with a child on their lap.



Lack of appropriate care

This includes not providing adequate and proper supervision, nourishment, clothing, shelter, education or medical care.

7. Child Safe Standards and Related Framework

All policies and procedures in the Organisation work together to create a child safe culture and strong commitment to protecting children.

This Policy is to be read in conjunction with all Safeguarding Policies and Procedures, the Early Learning and Care/Fun Club Operations Manual, and related People and Learning Policies and Procedures:

- Position Descriptions
- Code of Conduct
- Child Safety – Probity Checks Policy
- Grievance Policy
- Professional Development Policy
- Recruitment and Employment Policy
- Whistleblower Policy
- Workplace Investigations Policy

8. Implementation of the Child Safe Standards in Practice

At Big Fat Smile, we are committed to creating and maintaining an environment where children are safe, respected, and heard. Our practices align with the **NSW Child Safe Standards**, embedded into our organisational culture, governance, and daily operations.

1) Child safety and wellbeing is embedded in organisational leadership, governance and culture

- Child safety and wellbeing are core to our organisational mission, values and leadership.
- Our Organisation Strategic Plan has child safety front and centre.
- Our organisation publicly commits to child safety. Our Child Safe Commitment Statement is prominently displayed across all services, our website, and internal staff platforms.
- Child safety is a shared responsibility at all levels of the organisation.
- Our organisation establishes a culturally safe environment in which the diverse and unique identities and experiences of First Nations First Nations children and young people are respected and valued.
- Leaders and staff champion a set of core values, policies and practices that inform the organisation approach to child safety.
- A clearly defined Code of conduct provides guidelines for staff and volunteers on expected behavioural standards and responsibilities.
- Risk management strategies focus on preventing, identifying, and mitigating risks to children and young people.
- Staff and volunteers understand their obligations regarding information sharing and record keeping.

2) Children are empowered about their rights and participate in decisions affecting them which are taken seriously

- Children and young people are informed about their rights, including safety, information and participation.



- Child friendly strategies enable children and young people to communicate their views, make choices, participate in decision and raise concerns.
- Social connections are encouraged through peer friendships to foster belonging and reduce isolation.
- Age-appropriate abuse prevention education is made accessible to children.
- Staff and volunteers are attuned to signs of harm and facilitate child-friendly ways for children to communicate and raise their concerns.

3) Families and communities are informed, and involved in promoting child safety and wellbeing

- Families are recognised as primary caregivers and are actively engaged in decisions relating to their children.
- We maintain transparent, open communication with families and communities about our approach to child safety.
- Families and community members are encouraged to contribute to the development and review of child-safe policies and practices.

4) Equity is promoted, and diversity is upheld across the organisation

- Our organisation identifies and respects the diverse needs abilities and backgrounds of children and understand the value of treating them equally and inclusively.
- Children and young people have access to information, support and complaints processes in ways that are culturally safe, accessible, and easy to understand.
- The organisation pays particular attention to the needs of First Nations and Torres Strait Islander children, children with disability, and children from culturally and linguistically diverse backgrounds

5) People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice

- Recruitment, including advertising, interviewing processes, referee checks and staff, volunteer pre-employment screening support child safety and wellbeing.
- Relevant staff and volunteers have current working with children checks or equivalent background checks.
- All staff and volunteers receive an appropriate induction and code of conduct and are aware of their responsibilities in relation to children and young people, including record keeping, information sharing, and reporting obligations, as appropriate to their role.
- Ongoing supervision and performance management are aligned with child safety responsibilities.
- All staff receive ongoing refresher training on Code of Conduct and Identifying and Responding to Risk of Harm.

6) Processes to respond to complaints and concerns of child abuse are child focused. They are responsive, understood, accessible and used by children, young people, families, staff and volunteers

- The organisation has a child focused complaint handling policy and process which clearly outlines the roles and responsibilities of leaders, staff and volunteers.
- The processes dealing with different kinds of complaints, breaches of relevant policies or the Code of Conduct are culturally safe and are understood by all stakeholders.



- Complaints are taken seriously and responded to promptly and reporting, privacy and employment law obligations are met.

7) Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through continual education and training

At Big Fat Smile, the safety and wellbeing of children and young people is underpinned by a strong commitment to continual education, professional development, and specialised support for all staff and volunteers.

- **Comprehensive Training and Support** – all staff and volunteers are trained and supported by Big Fat Smile’s specialised Safeguarding Team. This team provides expert guidance, supervision, and resources to ensure that all personnel understand and can effectively apply child safety principles in their daily practice.
- **Implementation of Child Safety and Wellbeing Policies and Code of Conduct** – staff and volunteers receive in-depth training to confidently implement the organisation’s child safety and wellbeing policy. This includes understanding their roles and responsibilities, reporting requirements, and the practical application of policy in their work with children.
- **Structured Training Programs** – all child Facing Staff complete the **Look / Do / Tell** training series, which equips them to:
 - **Look** for signs of harm, distress, or risk in children and young people.
 - **Do** what is required to support the child and take immediate protective action where necessary.
 - **Tell** the appropriate person or authority to ensure concerns are reported and addressed according to policy and law.
- **Recognising and Responding to Harm** – staff are trained to identify a wide range of indicators of child harm, including physical, emotional, psychological, and sexual abuse, as well as neglect and harm caused by other children or young people. They also complete the Identify and Respond to Risk of Harm training, which provides them with the skills to take appropriate action and follow mandatory reporting processes.
- **Ongoing Professional Development** – in addition to core training, staff and volunteers have access to a suite of other child protection and wellbeing programs that address emerging risks, updates in legislation, trauma-informed practices, and techniques for engaging with children and families.
- **Creating Culturally Safe Environments** – staff receive dedicated training and resources to build inclusive, respectful, and culturally safe environments for all children and young people, including those from Aboriginal and Torres Strait Islander backgrounds, culturally and linguistically diverse communities, and children with disability.
- **eSafety and Digital Wellbeing Training** – recognising the growing role of technology in children’s lives, staff and volunteers also receive training in establishing and maintaining eSafety environments. This is line with the Model Code for Keeping Children Safe.

8) Physical and online environments minimise the opportunity for abuse to occur and promote safety and wellbeing for children



Big Fat Smile is committed to creating physical and digital environments that are proactively designed to protect children and young people from harm, while also promoting their development, autonomy, and right to privacy.

- Risks in the online and physical environments are identified and mitigated without compromising a child's right to privacy and healthy development
- The online environment is used in accordance with the model code when it comes to taking, sharing and storing images of children, the organisation's Code of Conduct and Safe Environments Policy.
- Risk management plans consider risks posed by organisational settings, activities and the physical environment.
- Organisations that contract facilities and services from third parties have procurement policies that ensure the safety of children and young people.

9) Implementation of the Child Safe Standards is continuously reviewed and improved

- Our organisation regularly reviews, evaluates and improves child safe practices our organisations child safe action plan is reviewed annually.
- Complaints, concerns and safety incidents are analysed to identify causes and systemic failures to inform continuous improvement. The organisation reports on findings to relevant stakeholders.

10) Policies and procedures document how the organisation is safe for children and young people

- Policies and procedures address all Child Safe Principles/ NSW Child Safe Standards
- Policies and procedures are documented and easy to understand
- Best practice models and stakeholder consultation inform the development of policies and procedures.
- Leaders champion and model compliance with policies and procedures
- Staff and volunteers understand and implement policies and procedures

9. Non-compliance

Big Fat Smile has zero tolerance for the abuse and neglect of children and as a result serious misconduct may lead to disciplinary action up to and including termination.

- Failure to report an incident, circumstance, allegation, disclosure, or suspicion which relates to abuse or neglect of a child is viewed by Big Fat Smile as serious misconduct and as a result may lead to disciplinary action.
- In NSW it is an offence to withhold without lawful excuse, refuse or wilfully fail to comply with any law requirement of the Office of the Children's Guardian.
- Failure to complete mandatory child safeguarding professional learning modules, action child safe alerts or complete required Safeguarding activities will be viewed by Big Fat Smile as misconduct and may lead to disciplinary action.
- In NSW it is an offence to fail to protect a child from child abuse in which an adult with the power or responsibility to act, knows there is a serious risk of a child becoming a victim of abuse, and negligently fails to reduce or remove that risk (s43b of the Crimes Act).
- In NSW it is an offence to fail to report child abuse in which an adult knows, believes or reasonably ought to know that a child abuse offence has been



committed against a child and, without reasonable excuse, does not report that offence to the police (s316A).

1. Relevant Legislation, Regulations and Standards

- Children's Guardian Act [2019]
- Child Protection (Working with Children) Act 2012
- Child Protection (Working with Children) Regulation 2013
- Crimes Act 1900
- Children and Young Persons (Care and Protection) Act 1998
- Children's Guardian (Child Safe Scheme) Bill 2021
- Disability Inclusion Act 1974
- Anti-discrimination Act 1977
- United Nations Conventions on the Rights of the Child
- National Principles for Child Safe Organisations
- NSW Child Safe Standards
- Education and Care National Law and Regulations 2012

10. Related documents

This policy must be read in conjunction with:

- Australian Human Rights Commission, National Principles for Child Safe Organisations
- Office of the Children's Guardian, Child Safe Standards and Child Safe Organisation Resources
- Office of the Children's Guardian, Reportable Conduct Scheme fact sheets
- Safeguarding Children Procedures
- Delegations of Authority Policy
- Education and Care Services Operations Manuals
- People and Culture Policies and Procedures
- ICT Information Security Policy
- Internet, Mobile Device, Email, Social Media Use Policy
- Privacy Policy
- Big Fat Smile Child Safe Framework
- Big Fat Smile Child Safe Action Plan
- Look, Do, Tell Framework (for Safeguarding Children)
- Protecting Children from Harm, Abuse and Neglect Procedure
- Managing Allegations or Suspicions of Child Harm, Abuse and Neglect Against Workplace Participants Procedure
- Identifying and Responding to Children's Sexual Behaviour Procedure
- Safeguarding Children Information Exchange Procedure
- Probity Policy
- Underperformance Policy

Kim Bertino
CEO



11. Version Control and Change History

Version	Effective Date	Responsible Position	Description	Next Review
Versions 1 to 9	Jul 2009 to June 2020		See archive Safeguarding Children Version Control Table prior to July 2023	
10	10 July 2023	Head Of Safeguarding Children	Updated to reflect the child safe standards, procedural content removed to separate procedures.	30 June 2025
011	08/2025	Head of Safeguarding	Improved links between the Child Safe Action Plan and policy Revised language to provide further guidance around Implementation of the Child Safe Standards Revised policy links based on current policies Revised titles, roles and responsibilities to align with current governance structure Inserted definitions of safeguarding, child protection, and types of abuse	08/2025