



Safeguarding Children Policy

1. Purpose

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 provides a whole of organisation approach to being a Child Safe Organisation and is in alignment with the requirements of the National Principles for Child Safe Organisations, the NSW Child Safe Scheme and relevant legislative obligations regarding child safety and child protection.

This includes National Law & Regulations, 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).

The Big Fat Smile Child Safe Framework is further underpinned by the Look, Do, Tell Framework (for Safeguarding Children) which guides all Big Fat Smile staff in the actions required to prevent, identify, and respond to child harm, abuse, and neglect.

This Policy is to be read in conjunction with the following suite of Safeguarding Children Procedures:

- 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
- Safeguarding Children Glossary.

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. Policy Based on Child Safe Organisation Principles

3.1 Child safety is embedded in leadership, governance, and culture

- Big Fat Smile publicly commits to child safety, and our commitment statement is available at all services and is displayed for public access on our website.
- The Big Fat Smile Child Safe Framework and Look, Do, Tell Framework (for Safeguarding Children) reinforces Big Fat smile's approach to prevent, identify and respond to child harm, abuse, and neglect.
- These Frameworks facilitate the implementation of the NSW Child Safe Standards and the National Principles for Child Safe Organisations at all levels of the organisation as well as the requirements under National Law and



Regulations, Child Protection Schemes and Legislation and reporting requirements.

- Governance processes prioritise safeguarding children by ensuring safeguarding is embedded in our Board Charter, strategic and business planning processes.
- The Child Safe Framework, Child Safe Action Plan and child safe initiatives and emerging risks are actively monitored by the Board and Executive.
- Big Fat Smile Code of Conduct and Child Safety and Wellbeing Standards of Behaviour set expectations regarding behaviours of all workplace participants in their interactions and engagement with children and in promoting and maintaining child safety and wellbeing.
- Robust Incident Management Response procedures effectively manage end to end processes related to child safety critical incidents.
- All centres are required to critically reflect on the implementation of the Child Safe Standards at their service and to develop and progress Child Safe Goals across the year to strengthen their child safe leadership, culture, and practices.

3.2 Children are listened to, informed, and meaningfully participate

- All workplace participants will uphold the rights and dignity of children and families.
- Teachers and educators will ensure that children are informed about their rights and Big Fat Smile's complaints processes by embedding teaching on child rights within the program and providing age- and stage-appropriate ways of providing feedback or raising complaints in line with the Look, Do, Tell Framework.
- Child friendly materials to explain the United Nations Convention on the Rights of the Child (UNCRC), the Look, Do, Tell Framework and Big Fat Smile feedback and complaint mechanisms will be displayed, accessible and explained to children and their families and advocates.
- Teachers and educators are required to implement strategies for children to learn about body and online safety strategies within the learning program.
- Teachers and educators will ensure children's health and care needs are met in a timely, respectful, and responsive manner and will establish a culture of consent by asking permission before supporting children with care routines.
- Big Fat Smile, teachers and educators will provide authentic opportunities for children's participation in decision making related to their safety and wellbeing. Children's views will be treated with respect.
- Big Fat Smile complaints handling procedures will be child-centric and reflect contemporary practices.

3.3 We partner with families and communities

- Policies and procedures related to safeguarding children are available to families and communities within services and on our website. Processes are in place to notify families about changes to policy and procedure updates within 14 days (as required under National Regulation 168) and opportunities are provided for families to provide feedback through this process.
- Big Fat Smile, teachers and educators share our organisational child safe approach and service specific child safe goals with families and communities through tours, orientation, visual posters, and written communications.



- Our families are surveyed regularly, and their insights are used to inform continuous improvement and practice. This includes feedback on child safety elements.
- Our staff engage with families and communities to build cultural safety and inclusion through partnerships and respectful relationships.
- Parental consent is sought for relevant activities.
- Teachers and educators engage with children, families and communities about their needs, circumstances and building authentic relationships
- Our staff provide information, resources, and advocacy to access additional supports and services.
- Big Fat Smile works with interagency partners to provide holistic child and family centred supports based on identified needs.

3.4 Embracing equity, diversity, and inclusion

- Policies are in place on equity, diversity, and inclusion.
- Cultural immersion training is available to all staff to build knowledge and capacity to create culturally safe environments.
- Educators and teachers support meaningful engagement with children and families to understand and include their unique diversities.
- Educators and teachers empower children to know their rights through intentional teaching and uphold the United Nations Convention on the Rights of the Child through decision making and interactions with children.
- Educators and teachers promote the safety and wellbeing of all children, paying particular attention to the needs of Aboriginal and Torres Strait Islanders, children who are culturally and linguistically diverse including refugee families and those who have experienced trauma, children living with a disability, children unable to live at home and LGBTIQ+ children.
- Big Fat Smile, educators and teachers engage with inclusion supports and resources to remove barriers to inclusion, and seek education and strategies for inclusive practices and environments for the children in our care.
- Big Fat Smile implements the Organisation's Reflect Reconciliation Action Plan (RAP) in collaboration with the RAP Working Group and RAP Key Advisory Group.
- Big Fat Smile staff ensure our Child Safe Framework and Child Safe Action Plan and initiatives strengthen and promote culturally safe environments for Aboriginal and Torres Strait Islander children.

3.5 Ensuring staff are suitable and supported

- Decisions about the employment or engagement of staff, volunteers, and students' prioritise child safety.
- End to end child safe recruitment and screening processes are in place from advertising, pre-employment screening and reference checks to conflict of interest management.
- All staff and volunteers are required to hold a current Working with Children Check (WWCC) to verify that they are suitable to work with children.
- Additional background checks are completed where required (for example for school-based apprenticeships and traineeships).
- All staff receive an appropriate induction to support their knowledge and understanding of their child safety and wellbeing responsibilities, the organisation's Child Safe Frameworks, suite of safeguarding policies and



procedures, the Code of Conduct and mandatory reporting responsibilities including reportable conduct.

- All staff have a probationary period.
- Centre Directors will roster according to ratio requirements, and as an additional safeguarding practice, out of school hours care services will roster with a 2-educator model minimum to minimise staff being left 1:1 with a child.
- Situational crime prevention techniques are employed such as 'natural surveillance' to further reduce the risk of harm to children. This includes factors such as window walls and landscaping considerations.
- Mandatory child safe professional learning plans are in place for all positions relevant to individual role responsibilities and contact with children. Professional learning may include identifying risk of harm to children, creating child safe organisations and reportable conduct as well as reporting obligations and annual refreshers.
- Targeted professional learning is provided for educators to scaffold children for success and inclusion through education, care, and recreation activities.
- Robust procedures are in place to identify, investigate and address safeguarding allegations and complaints in line with legislative requirements.
- A holistic employee assistance program is provided to enhance emotional, mental, and general psychological wellbeing of staff.

3.6 Child focused complaints systems

- Policies, procedures, and systems are in place for receiving, responding to, and investigating complaints, including concerns or complaints relating to Big Fat Smile staff conduct, misconduct, or criminal conduct.
- Policies and procedures are in place on reporting to external regulatory authorities, record keeping and information sharing and systems are maintained to ensure the organisation meets its reporting requirements and employment law and privacy obligations.
- All Big Fat Smile employees, including the Board, CEO (Chief Executive Officer) students, volunteers and contractors will assist to their fullest capacity with any investigation carried out by a regulatory authority, statutory agency or with any internal investigative process in relation to child harm, abuse, or neglect.

3.7 Staff knowledge, skills, and awareness

- All staff undertake mandatory safeguarding children professional learning as part of induction and further professional learning is available on child development, child safety and wellbeing, record keeping, indicators of child harm, responding to disclosures.
- Additional targeted professional learning is made available for educators to scaffold children for success and inclusion through education, care, and recreation activities.
- Under National Law (S162A), each Nominated Supervisor and each Person in Day-to-Day Charge of the service must successfully complete an accredited Child Protection Training course approved by the regulatory authority.
- All centre staff and volunteers must be aware of the existence and application of the current child protection law in their jurisdiction (Section 84 of the Education and Care National Law (2010)).



- All centre staff and volunteers must be aware of the existence and application of Big Fat Smile's policies and procedures relating to safeguarding children and child protection.
- Multiple opportunities for professional learning are provided throughout the year to refresh or build capability, knowledge and skills related to child protection and safeguarding children.
- Big Fat Smile staff who disclose harm or risks to children are supported through the EAP (Employee Assistance Program) when required.

3.8 Safe physical and online environments

- Daily internal and external environment checks are completed at education and care services.
- Risk assessments and plans are maintained at whole of organisation, service, program, and event specific levels incorporating physical risks as well as child safe risks.
- Regular reviews are made of physical safety, environments, and equipment at our facilities
- Detailed procedures and risk assessments are developed and maintained for high-risk activities including excursions, incursions (events), toileting, nappy changes, interactions with children, and supervision of children.
- Clear guidelines are held in our Code of Conduct and policies regarding the appropriate use of digital devices, systems, and platforms for staff and for children.
- Clear guidelines are held regarding publicity and distribution of images, noting that images of children in statutory care are unable to be published.
- Robust systems for content filtering, security controls, information management and supervision are held to provide digital safety.
- Biannual audit of Big Fat Smile devices is conducted to ensure devices are being used in line with policies and procedures.
- Volunteers or students are not permitted to work unsupervised within Big Fat Smile services and volunteers are not permitted to carry out personal care tasks for children.
- Visitor management processes are in place to ensure that visitors (including contractors) to the service are appropriately logged and supervised.
- To protect children from risks of child abuse and harm from third party contractors, contractors undertake Big Fat Smile Organisational induction including agreeing to comply with Big Fat Smile child safe expectations.
- The Child Safe Environment Policy identifies how the organisation ensures that children are safe and supervised when using devices or in the online environment.

3.9 Continuous Improvement of child safe approaches

- Big Fat Smile will embed the requirements of the NSW Child Safe Scheme through its Child Safe Framework and Child Safe Action Plan. This Plan aims to continually work to improve our child safe culture, leadership, environment, and practices.
- The Child Safe Action Plan is reviewed annually and reported quarterly to the Board. Child Safe initiatives are linked to portfolio business plans and reflect key gaps identified through investigations, contemporary child safe resources,



self-assessment tools and feedback from workplace participants, sector partners, children, and families.

- Each service has an individual child safe action plan and goals to progress annually to strengthen their child safe approach.
- Complaints, safeguarding, and investigation information is reviewed to identify themes, learnings and identify opportunities for changes in environments, policy, procedures or practices at individual, service, and systemic levels.
- Policies, procedures, and practices are reviewed with a child safe lens and to align with the Child Safe Standards and legislative requirements.

3.10 Documenting policies and procedures

- Policies and procedures are in place that demonstrate how the organisation ensures child safety and wellbeing.
- Mandatory professional learning is provided on all child safe policies and procedures.
- Child safety and wellbeing procedures are made accessible to families and communities in centres. Processes are in place to notify families about changes to policy and procedure updates within 14 days (as required under National Regulation 168) and opportunities are provided for families to provide feedback through this process.

4. Roles and Responsibilities

<p>Board of Directors</p>	<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. • 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.
<p>Chief Executive Officer and Executive Leadership Team</p>	<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.



	<ul style="list-style-type: none"> • 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. • Provide 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.
Managers and 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"> • Commit to creating a child safe culture, service delivery and environments for all children and young people 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. • 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. • Take action to implement child safe policies and procedures including the Look, Do, Tell Framework.

5. Implications for 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).

6. Reviewing the policy

The Safeguarding Children Policy will be reviewed every 2 years, unless there is a change to legislation, external guidance or in response to critical incidents or opportunities to strengthen our safeguarding approach within Big Fat Smile. The review process will be undertaken with children, families, communities, and internal stakeholders.

If you have any feedback to provide on this policy, please email: safeguarding@bigfatmile.com.au.

7. Glossary of Safeguarding Children Terms

Refer to the Safeguarding Children Glossary of Terms for terms used in this policy and related procedures.

8. Related Procedures and Plans

- 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

9. 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 including:
 - Big Fat Smile Code of Conduct and Child Safe Behaviour Standards
 - Child Safety – Probity Checks Policy
 - Investigation Policy, Investigation Procedure and Reportable Conduct Procedure
 - Conflict of Interest Policy
 - Recruitment and Employment Policy
 - Whistleblower Policy
- ICT Information Security Policy
- Internet, Mobile Device, Email, Social Media Use Policy
- Privacy Policy.

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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