

NATURE FOUNDATION POLICIES AND PROCEDURES

Section: Environment and Community

Title: YOUTH PROGRAM – CHILD SAFE ENVIRONMENTS

Policy Statement:

Nature Foundation is strongly committed to promoting children and young people's wellbeing and safeguarding them from harm. Specifically, Nature Foundation is committed to providing child safe environments across its programs at Nature Foundation reserves and at other activities and events.

Principles:

Nature Foundation will implement child safe practices that meet the legislative requirements of the *Children and Young People (Safety) Act 2017* and *Child Safety (Prohibited Persons) Act 2016*, and that align with the National Principles for Child Safe Organisations. Nature Foundation will:

- Take a holistic and coordinated approach to protect children and young people from harm (physical, sexual, emotional or psychological).
- Provide culturally safe environments and practices for Aboriginal and Torres Strait Islander children and young people, where cultural diversity is respected.
- Uphold child safe and child friendly practices, where children and young people feel respected, safe and valued regardless of their abilities, sex, gender, or social economic or cultural background. Bullying and harassment won't be tolerated.
- Give young people a voice in issues that concern them, through providing opportunities for feedback and evaluation of Nature Foundation youth programs.
- Ensure that safety and well-being underpin all related services, and that staff are supported to achieve this.
- Promote and discuss child safety issues and policy requirements within Nature Foundation.
- Work in partnership with government and non-government organisations to promote and protect the safety and well-being of children and young people.

Scope:

This policy primarily applies to all people directly involved in the provision of the Kids on Country™ program, or who work near areas providing these services. It also applies to Nature Foundation events should children and young people be present,

The policy applies to members of the Board and its committees, staff, facilitators, volunteers, contractors, and students or others undertaking placement or work experience.

Definitions:

Kids on Country™ Junior Ranger Program: a culture-first program, where Aboriginal high school students aged 13-19 are afforded the opportunity to grow under the mentorship of senior Aboriginal people, whilst engaging in practical on-country studies in conservation and land management.

Taken from the *Children and Young People (Safety) Act 2017, South Australia*:

Child and Young person: A child is a person under 18 years of age, and a young person refers to a cohort of this group aged 12-17 years.

Harm: refers to physical or psychological harm (whether caused by an act or omission) and includes such harm caused by sexual, physical, mental or emotional abuse or neglect.

Mandatory Reporter or Notifier: Section 30 of the Act defines a mandatory reporter as “employees of, or volunteers in, an organisation that provides health, welfare, education, sporting or recreational, child care or residential services wholly or partly for children and young people, being a person who— (i) **provides such services directly** to children and young people; or (ii) **holds a management position in the organisation the duties of which include direct responsibility for, or direct supervision of, the provision of those services to children and young people.**”

Section 31 of the Act requires that a mandated reporter or notifier must report or notify the Department for Child Protection if they suspect on reasonable grounds that a child or young person is, or may be, at risk of harm, when the suspicion is formed in the course of their employment (whether paid or voluntary).

Risk: a child or young person will be taken to be at risk if—

(a) the child or young person has suffered harm (being harm of a kind against which a child or young person is ordinarily protected); or

(b) there is a likelihood that the child or young person will suffer harm (being harm of a kind against which a child or young person is ordinarily protected).

Risk of Harm: is the preferred overarching term that covers neglect and various forms of abuse.

Responsibilities:

The Board is responsible for:

- Obtaining a Working with Children Check where required prior to participating in programs that bring them into contact with children under Nature Foundation’s care.
- Approving and periodically determining that the policy has been complied with.

The Chief Executive Officer, by Delegation of Board, is responsible for:

- Ensuring that all persons working or volunteering for Nature Foundation are aware of the policy and their obligations.
- Determining and managing any disciplinary process arising from an alleged policy breach.
- Assessing compliance with the policy and reporting relevant matters to the Board.

Managers are responsible for:

- Ensuring that all staff and volunteers working with or coming into contact with children in the care of Nature Foundation, undergo a Working with Children Check assessment once every five years (as set out in the *Child Safety (Prohibited Persons) Regulations 2019*).
- Notifying the Child Abuse Report Line on 13 14 78 as soon as practicable if they have a reasonable suspicion that a child or young person has suffered or is at risk of harm. (This

requirement applies to managers with direct responsibility for, or direct supervision of, the provision of those services to children and young people.)

- Removing any person who has been reported on suspicion of causing harm or risk of harm to a child, or of breaching the Code of Conduct, from any role that involves working with any child or young person until the conclusion of any investigation into the report.
- Ensuring that personnel they are responsible for are aware of and comply with the policy.

The Youth Programs Coordinator is responsible for:

- Development, implementation, monitoring and evaluation of the Kids on Country™ program, including policy, compliance and reporting obligations.
- Conducting regular risk assessments of the Kids on Country™ program and facilities.
- Providing training and supervision of Kids on Country™ personnel regarding safety protocols and appropriate behaviour.
- Empowering Kids on Country™ participants with an understanding of their rights, personal safety, and how to report concerns.
- Engaging with parents and guardians of Kids on Country™ participants and the wider community to foster a collaborative approach to child safety.
- Implementing and managing a clear process for reporting and responding to feedback, incidents and safety concerns.
- Overseeing compliance with Working with Children Checks of Nature Foundation personnel and liaising with the Department of Human Services as required.

Staff, Facilitators and Volunteers are responsible for:

- Adhering to the requirements of this policy by taking reasonable steps to ensure the safety and protection of children and young people they come into contact with during their work.
- Obtaining a Working with Children Check where required prior to participating in programs that bring them into contact with children under Nature Foundation's care.
- Treating all children and young people with dignity, equality and respect. Listening and responding appropriately to their views and concerns.
- Ensuring that children and young people understand their rights, and that expectations about program activities are explained in age-appropriate language.
- Responding quickly, fairly and transparently to any serious complaints made by a child, young person or their parent/guardian.
- If directly engaged in delivering services to children and young people, notifying the Child Abuse Report Line directly (on 13 14 78) as soon as practicable if they have a reasonable suspicion that a child or young person has suffered or is at risk of harm.

- If the child or young person is at immediate risk, report to South Australia Police (SAPOL) on 000. Reporting suspected or known child sexual abuse directly to the police is a legal obligation placed on all adults, even if not a mandated reporter.
- Speaking out or acting in the presence of unethical practices that are in breach of this policy and associated Code of Conduct.

Schools participating in the Kids on Country™ program are responsible for:

- Ensuring that a minimum of two staff members accompany students participating in the program. (Maximum participants in any program is 18.)
- Assisting with supervision of students throughout the program, including overnight.
- Transportation of students to and from the Nature Reserve at which the program is being delivered, and for removal of a student should this be required due to poor behaviour (including physical assault, damage to property and disruption to the program).
- Supporting staff and facilitators to de-escalate poor behaviour to ensure the safety of all involved. Where necessary and in conjunction with Nature Foundation and School Leadership staff, make arrangements for the student/s involved to leave the reserve as soon as reasonably possible.

Contractors and others will:

- Be made aware of and comply with relevant policies.

General Procedures:

1. Communication

This policy will be provided to schools participating in the Kids on Country™ Junior Ranger Program prior to the commencement of the program and made available directly to young people and their families on request (including a child friendly version). It will be available on the Nature Foundation website and intranet (Sharepoint). Policy requirements will be discussed with staff and volunteers during induction and reviewed with Kids on Country™ staff during the annual team planning session.

Young people participating in Kids on Country™ programs are provided with age-appropriate information, including their right to safety and their right to be listened to, and are involved in decision making as appropriate during the program. Feedback is encouraged during the program and written feedback is requested from students at the end of each program.

2. Code of Conduct

All Nature Foundation personnel (including Directors, staff and volunteers) are required to sign and comply with the Nature Foundation Code of Conduct, which requires them to behave ethically, including acting honestly and with integrity, being accountable and treating others with respect and courtesy.

Additionally, personnel who are involved in working with children and young people are required to comply with requirements of the Code of Conduct for Working with Children and Young People (Attachment C). This establishes the standards of behaviour expected in relation to interactions with the child or young person, their family and the broader community of which they are a part.

Feedback from students at the end of each Kids on Country™ program provides an opportunity to report any inappropriate behaviours potentially in breach of the Code of Conduct. Consequences of an established breach may include disciplinary action.

Expected Behaviours for Personnel Working with Children and Young People

a. Maintaining professional boundaries:

Staff and volunteers are responsible for maintaining professional boundaries with young people. This serves to protect both the adult and young person from misunderstandings and potential violation of the professional relationship, which may include breach of trust and a failure to meet duty of care.

- Where appropriate, ensure that a suitable adult is present when consulting with a child or young person.
- Model responsible and respectful behaviour including through the use of social media.
- Ensure that children and young people understand their rights and explain in age-appropriate language what they can expect during program activities.
- Avoid:
 - Unnecessary physical contact with a child or young person
 - Discrimination against any child or young person because of age, gender, cultural background, religion, vulnerability or sexuality
 - Developing any 'special' relationships with children or young people outside of professional relationships.
- Should a young person engage in inappropriate behaviour (violence, verbal abuse, sexual in nature) respectful steps must be taken immediately to discourage the behaviour. The incident should be documented and reported to the line manager and a plan of action should be developed to support the young person and the adult involved.

b. Appropriate physical contact and physical restraint:

Appropriate practices include providing physical contact when:

- Administering first aid.
- Supporting a child who has fallen or sustained an injury.
- Assisting a disabled young person with personal care needs (an individual care plan must be negotiated with their parents and or carers prior to program participation, and consent sought from the young person).

Physical restraint may be permitted in exceptional circumstances to meet duty of care, for example should a young person attack another young person or adult, or where threats of self-harm pose an immediate danger. Restraint must be reasonable and in proportion to the incident, always applying the minimum force needed to control the situation. Such incidents must be reported using the Nature Foundation reporting system.

3. Recruitment

Nature Foundation will take all reasonable steps to engage the most suitable and appropriate staff,

service providers and volunteers in its Kids on Country™ Junior Ranger Program. This commitment will be stated in all relevant job advertisements and position descriptions.

In accordance with the *Child Safety (Prohibited Persons) Act 2016*, Nature Foundation is registered with the Screening Unit of the Department for Human Services (DHS) and requires all people working or volunteering with children to undergo a Working with Children Check (WWCC). The WWCC is an assessment of whether a person poses an unacceptable risk to children which considers criminal history, child protection information and other information. Staff and volunteers who require a WWCC must apply directly to DHS and will be required to provide evidence of this prior to employment and to renew it every five years. The check is free for people who are only using them for volunteer work.

The WWCC replaces all other types of child-related employment screening checks. However, people with a valid DHS/DCSI child-related employment check will be recognised as having a Working with Children Check until it expires.

Nature Foundation will verify the accuracy of all WWCCs in the DHS Screening Unit portal and will advise the Screening Unit of any information obtained regarding serious criminal offence, child protection information, or disciplinary or misconduct information in relation to any person involved with the organisation.

4. Training, Supervision and Support for Workers

All staff, facilitators and relevant volunteers involved in working with children and young people are required to develop and maintain the necessary skills and understanding to create and promote child safe and friendly environments through completion of accredited training:

- Responding to Risk of Harm, Abuse and Neglect (RRHAN-EC), and also
- HLTAID003 Provide First Aid

Training should be undertaken within 3 months of commencement, and refresher updates should be attended every 3 years.

Relevant staff and managers will be provided with training concerning their obligations as Mandated Notifiers where there is reasonable suspicion that a child or young person has suffered or is at risk of harm.

The Youth Program Coordinator provides supervision and support to staff, facilitators and volunteers involved in the Kids on Country™ program. This includes presentations at pre-camp workshops and on ground support with a focus on child safety and wellbeing.

Cultural considerations

The predominant contact of Nature Foundation personnel with young people is through the Kids on Country™ program. Therefore, the cultural considerations of working with aboriginal communities are paramount.

It is expected that all personnel will respect that Aboriginal and Torres Strait Islander people have been nurturing and teaching children and young people on this land for thousands of years and recognise their traditional ways of being and caring for children. Nature Foundation has no tolerance for racism of any form and will create an environment that is safe for Aboriginal and Torres Strait Islander people.

Staff facilitators and volunteers will be provided the opportunity to participate in Aboriginal Cultural Competency training incorporating:

- Understanding diversity of cultures, world views and values
- Principles of cultural competency
- Overview of Aboriginal history and the impact of colonisation
- Aboriginal heritage, cultures and social structures
- Aboriginal communication styles
- Working with Aboriginal and Torres Strait Islander people and communities
- Effective engagement with Aboriginal people and communities.

5. Reporting and Responding to Harm or Risk of Harm

Mandated reporters in Nature Foundation are:

- Staff and facilitators whose roles are to coordinate or assist with delivering the Kids on Country™ program.
- Manager(s) of staff delivering the Kids on Country™ program.
- Staff and volunteers assisting with events where children or young people may be present.

Legislated reporting requirements are detailed under the 'Definitions' and 'Responsibilities' sections of this policy. A DHS Mandatory Reporting Information Booklet is available at: https://dhs.sa.gov.au/_data/assets/pdf_file/0003/103179/CSE-Mandatory-notification-information-booklet.PDF

An individual who identifies harm or risk of harm should make the report to authorities personally and can request support from another person if required. Following a report being made, the notifier is required to inform their manager, and the reported person will be removed from any role that involves working with any child or young person until authorities have concluded their investigation.

Even if not a mandated reporter, any person can report harm or risk of harm to a child or young person. All staff, facilitators and volunteers have a legal obligation to report child sexual abuse to the police and to protect a child from sexual abuse. Failure to meet these obligations may be considered a criminal offence.

Nature Foundation will cooperate with the Department for Child Protection and/or SAPOL regarding any investigation in connection with a report and will support the child or young person as needed, including by referral to other appropriate services. All information received regarding a report will be documented and securely stored.

6. Reporting and Responding to General Complaints or Feedback

Nature Foundation encourages feedback from young people and their families, either to staff members during the Kids on Country™ program or to the Nature Foundation office at any time (8340 2880).

Student Evaluation forms are used to seek feedback at the end of each program and have been designed to give voice to young people in improving our services. All complaints or concerns raised with Nature Foundation will be managed in accordance with procedures detailed in the *Complaints*

Management policy and procedures. Breaches or suspected breaches of the policy and associated Code of Conduct will be taken seriously and dealt with quickly, fairly and transparently. An internal investigation may occur, and disciplinary action taken in connection with proven breaches.

7. Risk Management Strategies

Nature Foundation will adopt a risk management approach to ensure the safety of children and young people at its reserves. Attachment B provides an assessment of risks associated with the Kids on Country™ program and how they will be mitigated.

Key risk control measures include:

- Closure of nature reserves to the public during scheduled youth programs.
- Requiring that all staff, facilitators and volunteers directly working or engaging with children at Nature Foundation properties hold a current WWCC.
- Minimising the presence of staff and volunteers on nature reserves during youth programs who are not directly involved in the delivery of those programs.
- Only permitting emergency contracted work to be undertaken on reserves when youth programs are being held and ensuring the supervision of such contractors whilst on reserve.
- Requiring all volunteers with Nature Foundation to be aged over 18 years.
- Providing physical environments that do not pose a risk of harm to participants of youth programs at Nature Foundation reserves.

8. Privacy

All personal information considered or recorded will respect the privacy of the individuals involved, whether they be staff, volunteers, families or children, unless there is a risk to someone's safety.

Nature Foundation will ensure that images of children and young people are only collected with written informed consent and are stored and utilised according to legislative and policy requirements.

Linkage to other Policies and Procedures:

Complaint Management Policy and Procedures

Duty of Care Policy and Procedures

First Aid Policy and Procedures

Risk Management Policy and Procedures

Nature Reserve Precinct Safety Policy and Procedures

Superseded Policies:

4.1 Child Safe Environments policy and procedures

4.3 Ethical Conduct when working with Children and Young People policy and procedures.

Forms or records linked to this Policy and Procedures:

- Kids on Country™ Risk Assessment
- Kids on Country™ Parent/Guardian Information pack
- Kids on Country™ Program Student Evaluation Form
- Child friendly Child Safe Environments policy
- Working with Children Check spreadsheet

Sourcing and referencing:

- Department of Human Services: [Child Safe Environment resources](#)
- Department of Human Services: [Mandatory Reporting Information Booklet](#)
- Department of Human Services: [Working with Children Communications Toolkit](#)
- Council of Australian Governments: [National Principles for Child Safe Organisations](#)
- National Office for Child Safety: Keeping our Kids Safe: [Cultural Safety and the National Principles for Child Safe Organisations](#)

Legislative context:

- Child Safety (Prohibited Persons) Act 2016*
- Children and Young People (Safety) Act 2017*
- Child Safety (Prohibited Persons) Regulations 2019*

Developed by:	Katie Perry / Gillian Elix	Development date:	July 2024
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Next review due: August 2027

Policy Owner	Nature Foundation
Policy Approval	The Nature Foundation Board by Delegation of Council.
Signed off by	Chair
Review Schedule	Every 3 years
Consultation	<i>Consultation between Nature Foundation Board, CEO and relevant Nature Foundation personnel as required.</i>

A new compliance statement will be lodged with the Department of Human Services when the policy is updated or reviewed. This policy will also be reviewed to ensure best practice at the annual Kids on Country™ planning meetings.

Signed by Chair

Name: Jan Ferguson

Signature: 

Version control and change history:

Version Number	Review Date	Reviewed by	Approved by	Amendment
1.0	29.9.18	K Perry, A Clark		Drafted
1.1	8.11.17	Reviewed by staff		Develop incident form, amend physical restraint clause
2.0	Nov 2017		Council	
2.1	19.5.18	A Clark		Condensed and fitted to new template
2.2	14.9.18	J Ferguson		Reviewed
2.3	30.11.18	H Hopton		Reviewed
2.4	5.2.19	Councillors		Minor amendments
3.0	25.2.19		Council	
3.1	4.1.21	A Clark		Rebranding and CLG edits
3.1	28.1.21	Katie Perry		Amended to include the new Child and Young Person (Safety) Act 2017 and the transition to Working with Children Screening Checks
3.1	19.2.21	A Clark H Hopton	CEO	Approved for use in grant applications To be approved by Board May 2021
3.1	21.6.21	SCC		Reviewed
3.1	28.6.21	Board	Board	
4.0	29.2.24	K Perry	Board	Major re-write and update Board review
4.1	15.7.24	G Elix / K Perry	CEO / Chair	Clarification of communication processes, Code of Conduct and complaint management

Attachments:

- A. Parliamentary Declaration
- B. Potential Kids on Country™ Risks and their Mitigation
- C. Code of Conduct for Working with Children and Young People

Attachment A: Parliamentary Declaration

- (1) The Parliament of South Australia recognises and acknowledges that—
- (a) children and young people are valued citizens of the State; and
 - (b) the future of the State is inextricably bound to the wellbeing of all its children and young people; and
 - (c) it is of vital importance to the State, and all of its citizens, that all children and young people are given the opportunity to thrive.
- (2) The Parliament of South Australia recognises that, as a State, we want each child and young person to benefit from (at least) the following outcomes:
- (a) to be safe from harm;
 - (b) to do well at all levels of learning and to have skills for life;
 - (c) to enjoy a healthy lifestyle;
 - (d) to be active citizens who have a voice and influence, and the Parliament of South Australia accordingly commits to promoting these outcomes.
- (3) The Parliament of South Australia acknowledges that outcomes for Aboriginal and Torres Strait Islander children and young people in care have historically been poor, and that it is unacceptable for outcomes for those children and young people to be any different to those for children and young people in care generally.
- (4) It is the intention of the Parliament of South Australia that the performance of functions in the administration and operation of this Act be done in collaboration with, and with the cooperation of, children and young people and their families rather than simply being done to or for them.

Attachment B: Potential Kids on Country™ Risks and their Mitigation

Identified risk	Actions to minimise risk
Physical contact	<ul style="list-style-type: none"> • any physical contact must be appropriate to the services being provided. • where physical contact is required, this is undertaken in a safe way by explaining why contact is required and what will happen and asking the young person for their permission (or their family if this is more appropriate) before proceeding. • unnecessary physical contact is not allowed.
Online communications	<ul style="list-style-type: none"> • appropriate supervision is provided for any online activities undertaken. • communication with young people via social media is not permitted.
Transportation	<ul style="list-style-type: none"> • transportation of young people to and from reserves is the responsibility of the participating school. • where transportation is required on reserve: <ul style="list-style-type: none"> ○ worker must have a valid, unrestricted driver's licence. ○ vehicle must be registered, insured and in roadworthy condition. ○ worker must not be alone in a vehicle with a young person.
Supervision	<ul style="list-style-type: none"> • young people are to be supervised at all times while on reserve. • if providing one to one consultation with a young person, it will be in line of sight of another adult where possible.
Taking images of young people	<ul style="list-style-type: none"> • disclosure will be made as to how the image is to be used and consent must be provided by the young person and parent/guardian. • images must be presented in a way that de-identifies the young person.
Physical environment	<ul style="list-style-type: none"> • the reserve is closed during Kids on Country™ programs. • out of bounds areas apply and young people are informed. • reserve asset management procedures are in place. • risk assessments are conducted for all activities. • all equipment used in programs is in good working order.
Privacy and confidentiality	<ul style="list-style-type: none"> • confidential information is stored privately in a locked filing cabinet (or similar place with restricted access). • digital files containing confidential information shall be protected electronically by restricting the access to only those requiring it to perform their duties. • workers must not disclose information regarding any young person without written consent of the young person and their parent/guardian.
Overnight and/or off-site activities	<ul style="list-style-type: none"> • consent of parent or guardian must be given. • privacy is provided when young people are bathing, toileting and dressing.

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| | <ul style="list-style-type: none">• young people will not be left under the supervision of unauthorised persons.• sleeping arrangements will be supervised by school staff.• young people have the right to contact their parents, or another adult, if they feel unsafe, uncomfortable, or distressed during the stay. |
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Attachment C: Code of Conduct for Working with Children and Young People

Personnel are expected to adhere to the highest standards of behaviour when working with children and young people. They will:

In relation to children and young people:

- Act in the best interests of children and young people, respecting their rights as enshrined in the United Nations Convention on the Rights of the Child (1991) and acknowledging the uniqueness and potential of all children and young people.
- Recognise that children and young people participate in different communities, such as family and schools, and respect these relationships, acknowledging the holistic nature of children and young people's learning.
- Ensure that children and young people are not discriminated against on the basis of gender, age, ability, economic status, family structure, lifestyle, ethnicity, religion, language, culture, or national origin, and recognise the significance of their cultural and linguistic identities.
- Create and maintain safe, healthy environments and places, which enhance children and young people's learning, development, engagement, initiative, self-worth and dignity.
- Listen and respond appropriately to the views and concerns of children and young people.
- Acknowledge children and young people as competent learners. Build active communities of engagement and inquiry where individual contributions are respected.
- Ensure children, young people and families with additional needs can exercise their rights.

In relation to families:

- Listen to and learn from families, in order to acknowledge and build upon their strengths and competencies. Develop positive relationships based on mutual trust and open communication that support them in their role of nurturing their children.
- Respect the uniqueness of each family and strive to learn about their culture, structure, lifestyle, customs, language, beliefs and kinship systems. Acknowledge that each family is affected by the community contexts in which they engage.
- Be sensitive to the vulnerabilities of children, young people and families and respond in ways that empower and maintain the dignity of all children, young people and families.
- Acknowledge the rights of families to make decisions about their children and young people and encourage them to engage in shared decision making where appropriate.
- Maintain confidentiality and respect the right of the family to privacy.

In relation to communities:

- Learn about the communities that the program is engaging with and ensure that programs are responsive to those contexts and community priorities.
- Connect with people, services and agencies within the communities that support children, young people and families, to enhance children and young people's health and wellbeing.

In relation to Nature Foundation:

- Support workplace policies, standards and practices that are fair, non-discriminatory and are in the best interests of children, young people and families.

Name _____

Signed _____ Dated _____