

CHILD SAFETY POLICY

Updated: April 2026



What are we talking about in this document?

This policy is about the safety of children in relation to child protection and child safety.



Who is this for?

This policy applies to children, families, staff, management, students, and visitors of the service.



Why do we need this policy?

This policy is about Keiki's commitment to working in accordance with the National Principles for Child Safe Organisations, acting ethically to ensure the safety and wellbeing of children and providing direction to educators, staff, families and visitors.

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Key Terms

Term	Meaning	Source
Child Protection	Child protection is the overarching responsibility of educators, staff, and management to safeguard children's safety and wellbeing.	
Mandatory Reporting	describes the legal obligation of certain professionals and community members to report incidences of child sexual abuse (WA). Mandatory reporters MUST report	WA Department of Communities Child protection

	to Child Protection Services if they believe on reasonable grounds that a child is in need of protection. Penalties may apply to mandated reporters who fail to report suspected abuse.	
National Child Safe Principles	The National Principles reflect ten child safe standards recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse, and are the vehicle for giving effect to recommendations relating to the standards. The National Principles have a broader scope that goes beyond child sexual abuse to cover other forms of potential harm to children and young people.	https://childsafe.humanrights.gov.au/national-principles/about-national-principles
Reasonable Grounds	refers to the need to have an objective basis for suspecting that a child may be at risk of abuse and neglect based on: • First-hand observation of the child or family • What the child, parent or other person has disclosed • What can reasonably be indirect based on observation, professional training and/ or experience.	WA Department of Communities Mandatory Reporting of Child Sexual Abuse in WA Western Australian Government
Reportable Conduct	refers to conduct of a staff member that includes sexual offences; sexual misconduct; physical assault; significant neglect of a child; any behaviour that causes significant emotional or psychological harm to a child; and other prescribed offences.	Ombudsman Western Australia
Reportable Conduct Scheme	Refers to the scheme that compels heads of organisations that exercise care, supervision or authority over children to notify allegations of, or convictions for, child abuse by their employees to the Ombudsman and then investigate these allegations. The Ombudsman will monitor, oversee and review these investigations	Ombudsman Western Australia



The Important Stuff

At Keiki Early Learning, child safety is a foundational commitment embedded across all aspects of our practice. It refers to the proactive and ongoing responsibility to protect children from harm, abuse, and neglect, while promoting their wellbeing, security, and sense of belonging.

Our approach is guided by the NQF Child Safe Culture Guide, National Principles for Child Safe Organisations, the Education and Care Services National Law (WA), the National Quality Standard (NQS), and the Children and Community Services Act 2004. It includes:

- **Child Safe Culture Guide:** The guide informs our leadership, staff practices, and family engagement strategies, helping us to identify risks, respond to concerns, and continuously improve. It also prepares us for upcoming regulatory changes, including strengthened reporting requirements and safe use of digital technologies. By embedding this guidance into our everyday practice, we ensure child safety is a shared responsibility and a lived culture across our service.
- **Child Safe Principles:** We foster a culture of safety through inclusive leadership, child empowerment, family engagement, and continuous improvement. These

principles reflect the standards recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse and extend to all forms of potential harm.

- **Supervision:** Children are actively supervised at all times using zoning, headcounts, and visual scanning. Services are always rostered above minimum ratio requirements to ensure robust supervision. Sleep and rest areas are designed with visibility in mind to ensure safe care routines.
- **Child Protection:** All staff are trained to identify and respond to signs of physical, emotional, sexual abuse, and neglect. Protective behaviours education is embedded in our curriculum, and new educators build trusted relationships with children before undertaking personal care routines.
- **Mandatory Reporting:** Educators are legally required to report child sexual abuse when they form a belief on reasonable grounds during the course of their work. Reports must be made to the Department for Child Protection and Family Support. Penalties apply for failure to report.
- **Internal Reporting:** Keiki maintains a clear internal reporting structure for all concerns, disclosures, or suspicions of abuse. Staff are supported to escalate issues promptly and confidentially.
- **Reportable Conduct Scheme:** As part of Western Australia's Reportable Conduct Scheme, Keiki is obligated to notify the Ombudsman of any allegations or convictions of child abuse involving staff. Investigations are conducted internally and monitored by the Ombudsman to ensure accountability and transparency.

This integrated framework ensures that child safety is not just a policy but a lived practice, embedded in our environments, upheld by our staff, and supported by our families and community.

Keiki Early Learning's Statement of Commitment as a Child Safe Organisation

Keiki Early Learning recognises that it is everyone's responsibility to keep children safe.

Keiki commits to supporting the safety of all children by providing:

- *Safety education to children, families, staff and the community;*
- *Secure, welcoming, and nurturing environments;*
- *Opportunities for the children in Keiki Early Learning services to develop safe, loving, and respectful relationships.*

Supervision – Child Safety

Keiki Early Learning's Supervision Policies ([OSHC – click here](#), [LDC & Preschool – click here](#)) and [Supervision Guide](#) provide educators with a clear framework outlining expectations for the supervision of children. All learning environments are intentionally planned and arranged to ensure children remain within sight and sound of educators at all times. Educators actively adjust their positions to maximise visibility and coverage, enabling them to observe the widest possible area.

Staffing rosters are designed to exceed minimum educator-to-child ratios, ensuring enhanced supervision across all settings. Regular risk assessments are conducted and reviewed to identify and mitigate supervision-related risks. These assessments inform the development of supervision plans that help educators recognise areas requiring heightened attention.

To support continuous improvement, Keiki provides educators with ongoing professional development focused on supervision. Additional resources, including newsletters and shared data platforms, are used to strengthen knowledge and build skills in effective supervision practices.

Child Protection

Child protection refers to the shared responsibility of educators, staff, and management to ensure the safety and wellbeing of all children in our care. At Keiki Early Learning, this commitment is upheld through a proactive and preventative framework that addresses all forms of abuse—physical, emotional, sexual, and neglect—and promotes a culture of safety across the service.

Key elements of our child protection approach include:

- Recognising and responding to signs of abuse or neglect in any form
- Creating child-safe environments through robust policies, ongoing training, active supervision, and protective behaviours education
- Managing and reporting allegations involving staff, volunteers, or students when a child is at risk of significant harm
- Maintaining confidentiality and accurate record keeping, especially in cases of suspected abuse

To support this framework, all educators and staff working with children are required to complete child protection training at least every two years, ensuring they remain informed, confident, and capable of safeguarding children effectively.

Preventative Framework

Leadership roles within the service, such as Nominated Supervisors, play a critical role in embedding a child safe culture by role-modelling best practice and actively monitoring staff conduct. In alignment with the ACECQA NQF Child Safe Culture Guide, Keiki Early Learning employs a robust child safety auditing system, engaging both internal and external auditors to regularly assess how effectively preventative frameworks are implemented across services. These audits support continuous improvement and ensure child safety is a lived and accountable practice.

Professional Practices

Educators, staff, and students at Keiki Early Learning are expected to consistently follow the service's policies and procedures, both while on-site and when working directly with children. These guidelines shape professional practice and ensure high-quality, safe, and inclusive education and care.

Keiki's policies clearly define acceptable and unacceptable behaviours for both children and staff, and offer practical strategies for guiding behaviour and supporting children with additional needs. In line with the ACECQA NQF Child Safe Culture Guide, educators participate in regular professional development focused on child safety, including emerging risks identified within the community. This ongoing learning supports a culture of vigilance, responsiveness, and continuous improvement.

Appropriate Discipline Expectations

Keiki Early Learning does not tolerate any form of corporal punishment or unreasonable discipline. These practices conflict with Keiki's philosophy, positive guidance approach, and the standards outlined in the National Quality Framework.

Examples of unacceptable discipline include:

- Hitting, pushing, slapping, pinching, or biting a child
- Force-feeding
- Yelling at or belittling a child
- Humiliating a child
- Physically dragging or pulling a child
- Locking a child away or isolating them (except for health-related quarantine)
- Consistently removing children from play areas or peers
- Moving children to another room as punishment
- Depriving a child of food or drink
- Unreasonable restraint (e.g. restraining in a highchair)
- Excluding a child from events
- Verbally or physically threatening a child

Protective Behaviours Education

Protective behaviours are embedded throughout Keiki's educational program, from nursery to OSHC services, to empower children with the knowledge, skills, and confidence to:

- Recognise unsafe situations
- Assert personal boundaries
- Seek help when needed

The content is age-appropriate and focuses on body awareness, communication, resilience, confidence, and help-seeking strategies. In line with the ACECQA NQF Child Safe Culture Guide, educators actively encourage children's participation in safety conversations, allowing them to share concerns both within and beyond the service. Children's input is valued and may inform safety practices and curriculum design.

As part of this approach, Keiki shares child safety information with families and invites their feedback. Families are provided access to relevant policies at enrolment and throughout their time at the service, supporting a collaborative and transparent child safe culture.

Use and Storage of Children's Images and Videos

To uphold child safety standards and comply with legislative requirements, the following practices apply across all Keiki Early Learning services:

- Only Keiki-owned and managed devices may be used to capture images or videos of children, and solely for the purpose of documenting learning and experiences.
- Media may only be captured for children whose parents or guardians have provided written consent, either through the enrolment form or via separate documentation.
- All images and videos are automatically deleted from Keiki devices after three months, or earlier if no longer required for educational purposes.
- Sharing of media is strictly limited to the scope of consent provided—such as via Xplor or approved social media channels. If shared via email, it must be sent from a Keiki email address directly to the child's parent or guardian.
- When accessing Keiki systems via a personal device, images and videos of children must not be downloaded, saved, or copied under any circumstances.
- Keiki devices are configured to prevent unauthorised sharing:
 - AirDrop is disabled
 - Emailing is restricted to Keiki-managed addresses only

These measures are in place to ensure the privacy, safety, and dignity of every child in our care.

Use of Digital Devices by Children

Children may occasionally use Keiki-owned devices, such as iPads or tablets, as part of the educational program. Technology is used only when necessary to enhance learning. When in

use, children are seated with an educator who remains within sight and sound to monitor access and engagement.

Personal Devices

To uphold child safety, privacy, confidentiality, and effective supervision, strict requirements apply to the use of personal digital, recording, and wearable devices while working at the service.

Educators, staff, students, and volunteers must not use, wear, or carry personal mobile phones, tablets, smart watches, or similar digital devices during working hours or while directly or indirectly supervising children, unless explicitly authorised by the Approved Provider.

Personal USB drives, SD cards, and other file transfer or storage media must not be used with service devices and should be kept in personal bags or not brought into the service.

Smart Watches and Wearable Devices – Not Permitted

Smart watches or wearable devices must not be worn or used at any time during working hours if they are capable of any of the following functions:

- Sending or receiving calls, messages, or notifications
- Connecting to the internet, social media, or cloud-based services
- Recording or capturing audio, images, or video
- Connecting to other devices via Bluetooth, Wi-Fi, or similar technology
- Transmitting or receiving data or communications in real time

These devices are not permitted at any time while working at the service, including during indirect supervision or routine tasks.

Permitted Devices

Basic fitness or health-tracking devices may be worn only where they:

- Do not send or receive communications
- Do not connect to the internet or other devices
- Are limited solely to health or fitness tracking functions (e.g. step counting or heart-rate monitoring)

Any permitted device must not cause distraction or interfere with active supervision, routines, or interactions with children.

Medical or Health-Related Exceptions

Limited exceptions may apply where a wearable device is required for a documented medical or health-related purpose.

- Use must be discussed with and approved by the Centre Coordinator and Approved Provider prior to use
- Appropriate risk controls must be identified and implemented
- Approval must be documented and reviewed as required

Application and Compliance

These requirements apply to all staff, students, and volunteers.

Compliance is essential to meet legal obligations relating to supervision, privacy, and confidentiality, and to maintain the trust of children, families, and the wider community. For further guidance, Keiki refers to ACECQA information on the use of digital devices in education and care services, including *Digital devices in centre-based education and care services (ACECQA)*.

Reporting and Notifications

Keiki Early Learning is committed to ensuring that all concerns related to child safety are responded to promptly, respectfully, and in accordance with legal and ethical obligations.

- **Mandatory Reporting (Child Sexual Abuse):** All educators and staff who are mandatory reporters under WA legislation must report any reasonable belief of **child sexual abuse** to the appropriate authorities without delay.
- **Internal Reporting:** Any concerns, disclosures, or observations must be documented clearly and reported to the Centre Coordinator/Nominated Supervisor who will then inform the Approved Provider and/or People with Management or Control. Reports should include factual, objective information and be submitted as soon as possible.
- **Non-Mandatory Concerns:** Where concerns do not meet the threshold for mandatory reporting, staff are still expected to raise them internally for monitoring and support. Concerns a child is at risk of harm or disclosures from a child reporting abuse will be reported to the appropriate authorities without delay.

Internal Reporting

Keiki Early Learning is committed to ensuring that all concerns related to child safety are reported promptly and appropriately. Our internal reporting process ensures that all staff understand their responsibilities and feel supported in taking action.

Serious Injury, Illness or Incident	Child at Risk of Harm (Abuse, Neglect, FV)	Allegations of Reportable Conduct
1. Complete Incident, Injury, Illness and trauma Record 2. Inform Responsible Person/ Nominated Supervisor 3. Inform Parent/Guardian within 24 hours 4. Nominated Supervisor will report to ECRU with PMC	1. Complete Documentation of Concerns or Disclosure Form 2. If a Mandatory Report – Report directly. Otherwise notify Nominated Supervisor or PMC 3. PMC will Report to Department of Communities and ECRU	1. Document Concerns 2. Notify Nominated Supervisor or PMC 3. PMC will commence Reportable Conduct Process and Investigation 4. PMC will notify ECRU, if required

People with Management or Control (PMC)

Approved Provider: Samantha Morrell

Compliance and Quality Manager: Kym Parkinson

Operations Manager – Finance and Systems: Laura Reynolds

Operations Manager – People and Culture: Amanda Bate

What is Mandatory Reporting?

The increasing prevalence of child abuse across Australia and the negative outcomes faced by abused children influenced governments across Australia to enact mandatory reporting laws as a social policy and public health measure. These laws require designated groups of people to report certain kinds of child abuse to government authorities.

Mandatory reporting of child sexual abuse in Western Australia is governed by the [Children and Community Services Act 2004](#) (the Act). In October 2021 the Western Australian Parliament passed the [Children and Community Services Amendment Act 2021](#)

to introduce new mandatory reporter groups, including ‘early childhood workers’.

Early Childhood Worker

A person whose role falls within the definition of ‘early childhood worker’ in section 124A of the Act (below) is a mandatory reporter.

“early childhood worker” means an adult who is—

- a) any of the following for the purposes of the Education and Care Services National Law (Western Australia) Act 2012 -
 - i. an approved provider;
 - ii. a person with management or control of an education and care service;
 - iii. a nominated supervisor for an approved education and care service;
 - iv. an educator;
 - v. a family day care co-ordinator;
 - vi. a family day care educator assistant; or
- b) licensee as defined in the Child Care Services Act 2007 section 3; or
- c) a supervising officer as defined in the Child Care Services Act 2007 section 5A(1); or
- d) a member of staff of a child care service, as defined in the Child Care Services Act 2007 section 4, whose duties include the provision of education and care to children.

Key points to note:

- The title given to a role does not determine whether a person is an early childhood worker under the mandatory reporting law.
- It does not matter if a person’s role as an early childhood worker is paid or unpaid both are captured.

When to make a report

Mandatory Reporting:

Early childhood workers in Western Australia are legally required to report child sexual abuse under the *Children and Community Services Act 2004*. A mandatory report must be made to the Department of Communities’ Mandatory Reporting Service when:

- The worker forms a belief that a child is, or has been, the subject of sexual abuse occurring on or after 1 November 2024;

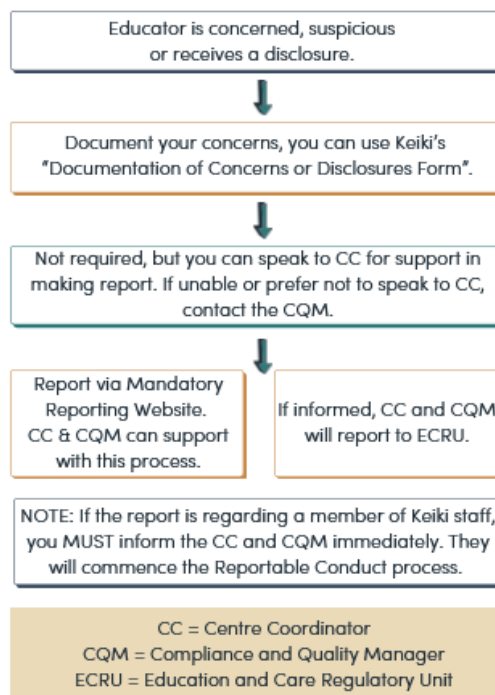
- The belief is based on reasonable grounds, such as direct observation, disclosures, or professional judgment;
- The belief is formed in the course of paid or unpaid work as an early childhood worker.

This legal duty is intended to protect children from sexual abuse that may be occurring now. The obligation applies if the belief is formed on or after commencement day, and the abuse occurred on or after that date or is still occurring.

Failure to report a reasonable belief of child sexual abuse is an offence and may result in a penalty of up to \$6,000.

If a worker holds a reasonable belief that child sexual abuse occurred prior to 1 November 2024, they should seek support from their Centre Coordinator or the Compliance and Quality Manager to determine the appropriate course of action

MANDATORY REPORTING FLOW CHART



Non- Mandatory Reporting:

While mandatory reporting in WA applies specifically to child sexual abuse from 1 November 2024, educators have a broader duty to protect children from all forms of harm. Non-mandatory reports cover concerns that don't meet the legal threshold but still pose a risk to a child's wellbeing.

Educators are often the first to notice signs of abuse or neglect. These must be documented and addressed through internal child safety procedures to enable early intervention.

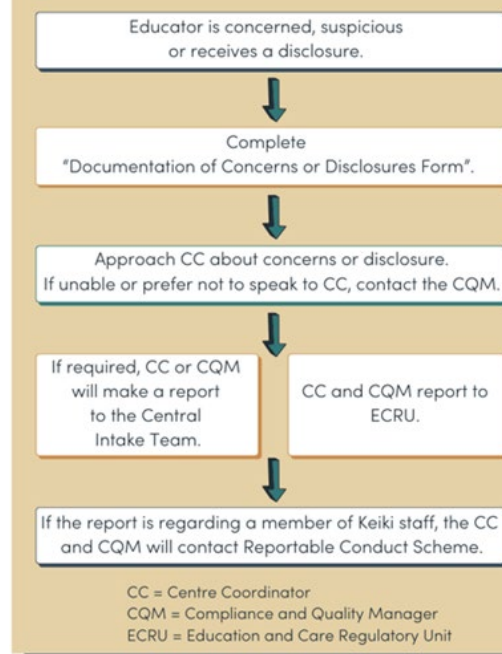
Why Reporting Matters:

- Duty of Care: Educators must act in the best interests of children.
- Regulatory Requirements: Services must notify authorities of any abuse allegations, even if not legally mandated.
- Early Intervention: Non-mandatory reports help monitor and support at-risk children.
- Support Structures: Concerns should be raised with the Centre Coordinator or Compliance and Quality Manager.

Types of Concerns:

- Physical abuse (e.g. unexplained injuries)
- Emotional abuse (e.g. exposure to threats or violence)

CONCERNS ABOUT A CHILD FLOW CHART



- Neglect (e.g. poor hygiene, lack of supervision)
- Sexual abuse indicators (e.g. grooming or disclosures not meeting mandatory criteria)

Educators must act on reasonable grounds based on observation, disclosure, or professional judgment, and services must respond in line with child protection/safety policies. A culture of vigilance ensures all concerns are taken seriously, whether legally mandated or not.

Documenting Concerns, Suspicions, or Disclosures

When documenting a concern or disclosure, record your observations, as well as precise details of any discussions with parents, guardians, authorised persons, children, or educators using a [Documentation of Concerns or Disclosures](#) form.

Include the following details:

- Child's information (full name, date of birth, address, and details of the child's parents and any siblings and any other people the child usually lives with)
- Time, date, and place of suspicion
- Time, date and the place of the disclosure
- Exactly what the child said and any clarifying questions you may have asked the child
- Any actions you have taken so far
- Date of report
- Your full name and signature

Disclosure of Harm

A disclosure of harm emerges when someone, including a child, tells you about harm that happened or is likely to happen. When a child discloses that he or she has been abused, it is an opportunity for an adult to provide immediate support and comfort and to assist in protecting the child from the abuse. It is also a chance to connect the child to professional services that will help keep them safe, provide support and facilitate their recover from trauma. Disclosure is about seeking support, and your response can have a great impact on the child or young person's ability to seek further help and recover from the trauma.

When you receive a disclosure of harm:

- Remain calm and allow the child to talk if it's an appropriate place. Use protective interrupting if it appears the child is about to make a disclosure in front of other children or other people, such as other children's parents or visitors to the service.
 - Gently interrupt the child by acknowledging them and preventing further disclosure, "It sounds like you have something really important to tell me..."
 - Be supportive and gently indicate that the child can talk in a more private situation "let's go over here to talk about that."
- Listen attentively, give the child your full attention and let them take their time. Let the child use their own words.
- If you need to find out if the child needs immediate protection, ask open questions such as who, what and where. Avoid any other questions as they may influence their responses and interfere with later investigations.
- Reassure the child they are doing the right thing and that this is not their fault.
- Be truthful and honest about what will happen next, tell them that you are now going to tell someone who will help them.

REMEMBER

- Do not investigate.
- Do not promise to keep a secret.
- Do not attempt to discuss the matter with the parties involved or to mediate a conversation.

- Do not discuss the disclosure with anyone other than the Centre Coordinator/Nominated Supervisor and the Compliance and Quality Manager.
- It is important that any disclosure remains confidential, as it is vitally important to remember that no confirmation of any allegation can be made until the matter is investigated. The individual who makes the complaint should not inform the suspected perpetrator (if known). This ensures the matter can be investigated without contamination of evidence or pre-rehearsed statements. It also minimises the risk of retaliation on the child for disclosing.

How to make a report

Mandatory Reporting:

You can make a mandatory report to the Department of Communities' Mandatory reporting Service. Educators are encouraged, but not required to, go to their Centre Coordinator/Nominated Supervisor for support in making the report. If you have a reasonable belief regarding the sexual abuse of a child, you must make a report as soon as practicable after you form this belief.

If the matter is regarding a member of Keiki staff (including students), educators, staff and students must inform the Centre Coordinator/Nominated Supervisor or Compliance and Quality Manager immediately.

Reports can be made online through the [Mandatory Reporting website](#), by email if you are experiencing technical difficulties in lodging an online report by emailing mrs@communities.wa.gov.au to request a hard copy for completion or by calling 1800 708 704.

If a report is made orally, a written report must also be made as soon as practicable (ideally within 24 hours) after making the oral report. Failure to submit a written report is an offence that carried a maximum penalty of \$3,000.

For support in making the online report, you can refer to the [Department of Communities' Mandatory Reporting Information System User Document](#) or [Mandatory Reporting of Child Sexual Abuse in WA - Resources](#).

If you are worried about your safety when making the mandatory report, please discuss this with your Centre Coordinator/Nominated Supervisor and/or Compliance and Quality Manager or the Western Australian Police.

Failure to make a mandatory report is an offence with a maximum penalty of \$6,000.

If a person is charged with the offence of failing to make a mandatory report, there is a defence under section 124B(3) of the Act if the person can prove that he or she honestly and reasonably believed that a report had already been made to the Department of Communities or that the Department of Communities had already made inquiries or taken action in relation to the child's wellbeing.

Non-Mandatory Reporting:

Educators must share their concerns with their Centre Coordinator/Nominated Supervisors or the Quality and Compliance Manager (or another Person with Management or Control). Centre Coordinators/Nominated Supervisors and the Compliance and Quality Manager will determine if a report needs to be made to the Central Intake Team at Child Protection and Family Support (Department of Communities).

Educators and staff are able to make a referral to the Central Intake Team without sharing their concerns with Keiki Leadership staff and can do so by calling 1800 273 889.

Allegations against Keiki Staff and Students:

NOTE: If the matter is regarding a member of Keiki staff (including students), educators, staff and students must inform the Centre Coordinator/Nominated Supervisor or Compliance and Quality Manager immediately.

What happens next?**Mandatory Reporting:**

After receiving a report, the Mandatory Reporting Service must send a copy to the Western Australia Police. Then the Mandatory Reporting Service conducts an initial assessment to decide on the next steps in relation to the child, including determining if any immediate action is required to protect the child's safety. You may be contacted by the WA Police and/or the Department of Communities for further information after submitting the report.

Section 124F of the Children and Community Services Act 2004 has strict provisions relating to the confidentiality of the identity of a mandatory reporter. Anyone who becomes aware of the identity of a mandatory reporter must not disclose identifying information to another person unless an exception under that section applies.

Section 129(2) of the Children and Community Services Act 2004 provided protection for mandatory reporters from liability. This sections provides that mandatory reporters who make a report under section 124B(1) in good faith:

- Do not incur and civil or criminal liability; and
- Are not to be taken as having breached any duty of confidentiality; and
- Are taken to have not breached any professional conduct principles.

If the Centre Coordinator/Nominated Supervisor is aware that an educator, staff member or student has made a report they will notify the Education and Care Regulatory Authority.

Non-Mandatory Reporting:

The Central Intake Team (Child Protection) will receive the report and determine what happens next. If an investigation does take place the Central Intake Team may contact the service for more information. Support may be offered to the family if required or further action may be taken.

All reports made to the Central Intake Team are confidential, however many families do not use any other services and will recognise that the service is who made the report.

The Keiki Hub will support the service through this process.

People who voluntarily notify Communities in good faith about concerns for a child are protected under the legislation and confidentiality provisions similar to mandatory reporters apply in the Children and Community Services Act 2004.

Allegations regarding matters involving Educators, Staff and Students:

If an allegation is made about a Keiki staff member or student, Keiki will initiate the Reportable Conduct process. This will include making a notification to the Reportable Conduct Scheme.

All reports regarding allegations of child abuse will be reported to the Education and Care Regulatory Authority.

Reportable Conduct Scheme

The Reportable Conduct Scheme in Western Australia provides independent oversight of how organisations that care for, supervise, or hold authority over children respond to allegations or convictions of child abuse involving their staff. Its purpose is to strengthen child safety by encouraging transparency, accountability, and continuous improvement in organisational practices.

Under the Scheme, heads of organisations, such as the Approved Provider at Keiki Early Learning, are legally required to:

- Notify the Ombudsman WA within 7 days of becoming aware of any allegation or conviction involving reportable conduct by an employee, volunteer, student, or contractor aged 18 or over.
- Investigate the allegation internally.
- Submit a report to the Ombudsman detailing the outcome of the investigation and any actions taken.

Reportable conduct includes:

- Sexual abuse or sexual misconduct
- Physical assault
- Significant neglect (including supervisory neglect)
- Behaviour causing serious emotional or psychological harm to a child

At Keiki, Centre Coordinators and Nominated Supervisors must immediately inform the Approved Provider and Compliance and Quality Manager of any such allegations or convictions, regardless of whether the conduct occurred during the course of employment.

If you witness an incident or have concerns about an educator's interactions with children, please speak directly with the Centre Coordinator or Nominated Supervisor.

The Ombudsman

The Ombudsman is an impartial officer who serves parliament and is independent of the Government of the day. The office of the Ombudsman has particular expertise in investigating matter involving the safety and welfare of children, including its longstanding child death review and family and domestic violence review functions.

The Ombudsman will monitor, oversee and review investigations undertaken by Keiki into allegations of, and convictions for, abuse of children involving any of Keiki's employees (including volunteers, students and contractors employed to work with the children). The Ombudsman may also at any time investigate matters of their own motion.

Any findings of reportable conduct will be handed over to the Ombudsman to determine the next steps.

Recognising and Reporting Unsafe or Inappropriate Behaviour (Whistleblowing)

All staff have a professional responsibility to remain vigilant and to speak up about concerns where a child's safety, wellbeing, dignity, or rights may be compromised. Recognising risks, responding appropriately, and reporting concerns are normal and expected parts of everyday practice, and staff may raise concerns in good faith without fear of retaliation.

This includes recognising and responding to situations such as, but not limited to:

- Using unsafe lifting, carrying, or handling techniques that may place children or staff at risk of physical injury.
- Inadequate supervision, including not following supervision policies and procedures

or failing to actively monitor children.

- Seeking or encouraging one-on-one interactions with children outside approved educational, care, or professional contexts.
- Not consistently meeting children's basic care needs, such as changing, feeding, comforting, or responding appropriately to distress.
- Interactions that are not professionally appropriate, including overly familiar behaviour, excessive affection, or intimate touching.
- Showing favouritism, special treatment, or gift-giving to individual children in ways that may create unequal or inappropriate relationships.
- Discriminating against, excluding, or treating children differently based on race, ability, gender, culture, or other personal characteristics.
- Sharing confidential or sensitive information about children or families with individuals who are not authorised to receive it.
- Failing to respond to, escalate, or report concerns or incidents of physical or sexual abuse within required timeframes.
- Not intervening promptly in unsafe situations, such as absconding risks, fence climbing, or aggressive behaviours.
- Using inappropriate language or tone when speaking with children, including sarcasm, shaming, threats, or dismissive responses.
- Ignoring or minimising signs of emotional distress or dysregulation, such as withdrawal, persistent crying, or sudden changes in behaviour.
- Not maintaining active supervision and visibility, including being distracted by personal devices or conversations.

Raising concerns, including through whistleblowing, is a supported and protected action when done in good faith and with reasonable grounds. The service does not tolerate victimisation or retaliation against any person who reports concerns, recognising that speaking up is a core part of professional duty and a child safe culture.

Education and Care Regulatory Unit

Under the National Law and Regulations, the Approved Provider must notify ECRU of:

- Any incident or allegation of physical or sexual abuse occurring while a child is being educated and cared for by the service.
- This includes suspected abuse involving staff, volunteers, or contractors.

Notifications must be made with 24 hours, and are typically submitted via the National Quality Agenda IT System (NQA ITS) or directly to ECRU depending on the nature of the incident.

Qualifications and Training Requirements

Mandatory Reporting and Child Protection Training – Child Safety Training

To ensure best practice, all educators will attend compulsory Child Protection or Mandatory Reporting training every 24 months to ensure they are kept updated and informed of their current responsibilities as Mandatory Reporters.

From February 27th 2026, educators, students, volunteers, managers and administration staff have access to Child Safety Training via the [Geccko online learning platform](#). This training will replace the Mandatory Reporting and Child Protection Training requirement currently set and will need to be renewed at least every 24 months, unless otherwise directed by the learning platform or by the Education and Care Regulatory Authority.

Working with Children Checks

All educators, staff, volunteers, students and visitors to the service who are working with the children must hold a current and valid Working With Children Check (WWCC), unless the person meets the criteria for exemption from a WWCC. See exceptions at [Working with Children Check - Who needs a WWCC Check? \(www.wa.gov.au\)](http://www.wa.gov.au)

Nominated Supervisors will regularly check the validity of each educator, staff, student and volunteer's WWCC to ensure it remains current.

Role and Responsibility Understanding

All employees, students and volunteers are:

- Clear about their roles and responsibilities regarding child protection and have access to the Child Safety Policy.
- Aware of their requirements to report or to immediately inform the Centre Coordinator/Nominated Supervisor if they believe a child is at risk of or has experienced any form of child abuse.
- Aware of the indicators showing a child may be at risk of harm or significant risk of harm.

Breach of the Child Safety Policy**Duty of Care and Breach Management**

All educators and staff working with children at Keiki Early Learning have a fundamental duty of care to support and protect children. A breach of this duty may occur when a person:

- Acts in a way that a reasonable person in their position would not, given the circumstances.
- Fails to act in a way that a reasonable person in their position would, when required.
- Causes harm—either through action or inaction—to someone to whom they owe a duty of care.

Responding to a Breach

Keiki Management will respond to any breach in a fair, unbiased, and supportive manner by:

- Informing all parties involved of the process and discussing the breach openly.
- Providing the educator with an opportunity to share their account of events.
- Documenting all details, including perspectives from all parties and the final outcome.
- Maintaining confidentiality throughout the process.
- Determining an appropriate outcome, based on evidence and collaborative discussion.

Possible Outcomes

Depending on the nature and severity of the breach, outcomes may include:

- Reinforcing relevant elements of the Child Safety Policy and Procedures.
- Increasing supervision and support for the educator.
- Providing additional education or training.
- Facilitating mediation between involved parties (where appropriate).
- Implementing disciplinary action, if required.
- Reviewing and updating existing policies and procedures, or developing new ones as necessary.

National Principles for Child Safe Organisations

National Principle 1: Child safety and wellbeing is embedded in organisational leadership, governance and culture

The service upholds National Principle 1 of the Child Safe Organisations WA Guidelines through a thorough induction for new staff and ongoing training for all educators. Our philosophy places children's best interests at the centre of every decision, supported by a clear organisational structure and guidance from the Keiki Hub.

Key policies that provide further detail and support National Principle 1 include [Code of Conduct](#), [Grievance Policy](#), [Governance Policy](#), [Positive Guidance](#), [Inclusion and Relationships with Children Policy](#), and [Volunteers, Relief Staff and Students Policy](#)

National Principle 2: Children and young people are informed about their rights, participate in decisions affecting them, and are taken seriously.

The service supports National Principle 2 by prioritising children's voices in the educational program. Our curriculum encourages agency, choice, and expression, while educators use positive guidance and foster respectful relationships to create a safe, inclusive environment where every child feels valued.

Key policies that provide further detail and support National Principle 2 include [Educational Program and Curriculum Policy](#), and [Positive Guidance, Inclusion and Relationships with Children Policy](#)

National Principle 3: Families, carers and communities are informed and involved in promoting child safety and wellbeing.

The service supports National Principle 3 by building strong partnerships with families and the local community. Families are given access to policies at enrolment and invited to contribute to reviews. Educators and Coordinators collaborate with families to reflect their cultures and practices, and engage with community experts to support parent education.

Key policies that provide further detail and support National Principle 3 include [Educational Program and Curriculum Policy](#)

National Principle 4: Equity is upheld and diverse needs respected in policy and practice

The service supports National Principle 4 by promoting equity, inclusion, and cultural safety. Educators build empathetic relationships and celebrate diversity, ensuring all children feel welcome and valued. Staff receive ongoing training and collaborate with external professionals to meet each child's unique needs, while resources and activities reflect and respect diverse backgrounds.

Key policies that provide further detail and support National Principle 4 include [Educational Program and Curriculum Policy](#), and [Positive Guidance, Inclusion and Relationships with Children Policy](#)

National Principle 5: People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.

The service supports National Principle 5 by ensuring all staff are qualified, trained, and aware of their responsibilities. Educators hold WWCC and first aid, complete child protection and food safety training, and meet all regulatory requirements. Positive guidance strategies are used to support behaviour, creating a safe and nurturing environment for every child.

Key policies that provide further detail and support National Principle 5 include [Child Safety Policy](#), [Supervision of Children Policy](#), [Code of Conduct](#), [Responsible Person Policy](#), [Positive Guidance, Inclusion and Relationships with Children Policy](#), and [Volunteers, Relief Staff and Students Policy](#)

National Principle 6: Processes to respond to complaints and concerns are child focused

The service supports National Principle 6 through a clear Code of Conduct and complaints process for staff and families. Educators create a safe space for children and families to raise concerns, and with child protection training, they understand their responsibilities as advocates and mandatory reporters. The Keiki Hub provides guidance to ensure consistent and effective complaint resolution across all services.

Key policies that provide further detail and support National Principle 6 include [Grievance Policy](#), [Code of Conduct](#), [Child Safety Policy](#), and [Positive Guidance, Inclusion and Relationships with Children Policy](#)

National Principle 7: Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.

The service supports National Principle 7 by fostering a culture of ongoing learning and reflection. Coordinators prioritise professional development, including child protection and external training, to strengthen educators' capacity to safeguard children. All services maintain Quality Improvement and Reconciliation Action Plans to support continuous improvement and culturally safe practices.

Key policies that provide further detail and support National Principle 7 include [Child Safety Policy](#), and [Governance Policy](#)

National Principle 8: Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.

The service supports National Principle 8 by ensuring safety across physical and online environments. Educators follow supervision and risk assessment procedures, adapt spaces to reduce harm, and promote online safety through the Code of Conduct. Children are taught about safety in age-appropriate ways, fostering a secure and supportive environment.

Key policies that provide further detail and support National Principle 8 include [Supervision of Children Policy](#), [Code of Conduct](#), [Child Safety Policy](#), [Positive Guidance, Inclusion and Relationships with Children Policy](#), and [Service Cleaning and Maintenance Policy](#)

National Principle 9: Implementation of the National Principles for Child Safe Organisations is regularly reviewed and improved.

The service supports National Principle 9 by fostering a culture of continuous improvement. Guided by the Keiki philosophy, staff regularly review Quality Improvement Plans and are supported by leadership to raise concerns and share ideas. Feedback from children, families, and staff is encouraged to strengthen our commitment to child safety and wellbeing.

Key policies that provide further detail and support National Principle 9 include [Governance Policy](#)

National Principle 10: Policies and procedures document how the organisation is safe for children and young people.

The service supports National Principle 10 by maintaining accessible, well-documented policies and procedures. Staff and families can view policies via QR codes and are encouraged to participate in reviews. The Policy and Procedure Management Policy ensures staff access during induction and supports regular updates to align with child safety standards, regulations, and law.

Key policies that provide further detail and support National Principle 10 include [Policy and Procedure Management Policy](#), and [Governance Policy](#)



Supporting Documents

Policies

[Arrival, Departure and Authorisation Policy](#)
[Educational Program and Curriculum Policy](#)
[Excursion, Incursion and Safe Transportation Policy](#)
[Grievance Policy](#)
[Incident, Illness and Administration of First Aid Policy](#)
[Positive Guidance and Interactions with Children Policy](#)
[Supervision of Children Policy](#)
[Workplace Health and Safety Policy](#)

Documents

[Documentation of Concerns or Disclosure Form](#)

Resources

[Children and Community Services Act 2004](#)
[ACECQA Child Safety Review and Guidelines](#)
[Education and Care Services National Law \(WA\) Act 2012](#)
[Education and Care Services National Regulations 2012](#)
[Department of Communities – Concerns for the safety or wellbeing of a child or young person](#)



Sources

- Australian Children's Education & Care Quality Authority (ACECQA).
- Early Childhood Australia Code of Ethics. (2016).
- Education and Care Services National Law (WA) Act 2012. (2023).
- Education and Care Services National Regulations 2012. (2024).
- Guide to the National Quality Framework. (2024).
- Mandatory Reporting of Child Sexual Abuse in WA. [Mandatory Reporting of Child Sexual Abuse in WA | Western Australian Government \(www.wa.gov.au\)](#) (2024)
- Children and Community Services Act 2004 (2024).
- Government of Western Australia – Department of Communities. Recognising Child Abuse. https://www.wa.gov.au/system/files/2021-11/Recognise-child-abuse_0.pdf. (2021)
- ACECQA Information Sheet Inappropriate Discipline. <https://www.acecqa.gov.au/sites/default/files/2020-06/inappropriate-discipline.pdf>. (2020).
- Ombudsman Western Australia. [Ombudsman Western Australia](#). (2023)
- Acecqa Child Safety Review and Guidelines – [Final Report Findings](#)
- Taking Images or Videos of Children while Providing Early Childhood Education and Care – [Guidelines for the National Model Code](#)



Links to Regulations

National Quality Standard

Quality Area 2: Children's Health and Safety

2.2	Safety	Each child is protected.
2.2.1	Supervision	At all times, reasonable precautions and adequate supervision ensure children are protected from harm and hazard.
2.2.2	Incident and Emergency Management	Plans to effectively manage incidents and emergencies are developed in consultation with relevant authorities, practised and implemented.
2.2.3	Child protection	Management, educators and staff are aware of their roles and responsibilities to identify and respond to every child at risk of abuse or neglect.

Quality Area 4: Staffing Arrangements

4.2.2	Professional standards	Professional standards guide practice, interactions and relationships.
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Quality Area 5: Relationships with children		
5.1	Relationships between educators and children	Respectful and equitable relationships are maintained with each child.
5.1.1	Positive educator to child interactions	Responsive and meaningful interactions build trusting relationships which engage and support each child to feel secure, confident and included.

Education and Care Services National Regulations	
84	Awareness of child protection law
85	Incident, injury, trauma and illness policies and procedures
86	Notification to parents of incident, injury, trauma and illness
87	Incident, injury, trauma and illness record
99	Children leaving the education and care service premises
115	Premises designed to facilitate supervision
155	Interactions with children
157	Access for parents
160	Child enrolment records to be kept by approved provider and family day care educator
168	Education and care services must have policies and procedures
170	Policies and procedures to be followed
171	Policies and procedures to be kept available
172	Notification of change to policies or procedures
175	Prescribed information to be notified to Regulatory Authority
177	Prescribed enrolment and other documents to be kept by approved provider
181	Confidentiality of records kept by approved provider
183	Storage of record and other documents

Education and Care Services National Law	
162A	Persons in day-to-day charge and nominated supervisors to have child protection training
166	Offence to use inappropriate discipline
167	Offence relating to protection of children from harm and hazards
174	Offence to fail to notify certain information to Regulatory Authority
175	Offence relating to requirement to keep enrolment and other documents



Review & Document Control	
Policy Reviewed	Modifications
July/August 2025	Providing a Child Safe Environment Policy and Child Protection Policy combined to create Child Safety Policy. Improved content to align with recommendations around safe use of devices, personal devices, reportable conduct, reporting concerns and model code.
April 2026	Updated information about smart watches. Added about Child Safety Training and extended the recognising and reporting to include whistleblowing.

Disclaimer

It is each employee, family and visitor to the service's responsibility to read, understand, follow and address any concerns with management about this policy.

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