



SACRED

JUSTICE

Trauma to Triumph

CHILD PROTECTION POLICY AND PROCEDURE

Sacred Justice Child Protection Policy and Procedure (CPPP)

Sacred Justice Incorporated (SJI) has developed this Policy and Procedure to foster a safe and supportive service environment for children and young people by identifying potential risks of harm to children and young people and implementing strategies to minimise this risk in relation to the activities and services provided by SJI.

Who must comply with this Policy and Procedure?

This CPPP applies to all persons working for or with SJI or volunteering with SJI or working or volunteering on the premises SJI operates from, including but not limited to SJI staff, contractors and volunteers. Parents, guardians, family members and friends are bound by the *SJI Family and Friends Code of Conduct*.

Introduction

SJI advocates for the human rights of children with disabilities or neurodivergence to be protected from sexual, physical, psychological, verbal abuse and trauma caused by medical experiences. Our organisation provides safe, protective healing spaces for children and their families. Some of our clients have experienced victimisation, trauma, abuse and sexualisation. Australia has become an increasingly voyeuristic and sexualised nation, making children feel anxious, unsafe and uncomfortable. Our workshop and retreat spaces must be free from voyeuristic behaviours, the sexualisation of women and children and any other unconscious, toxic patriarchal behaviours that have become normalised in Australian society. We believe that Working with Children Blue Cards and Police Clearances are only the first level of defence to protect children from sexual and other abuses.

Policy Objective

This policy aims to ensure that our organisation provides services in a *Child-Safe Environment*. In a Child-Safe Environment, concerns about the welfare or safety of children are responded to appropriately; children and their families are actively educated, informed and empowered to protect children; staff and volunteers are educated to prevent child sexual abuse (CSA).

We undertake advocacy, educational and therapeutic services with the understanding that perpetrators of CSA and voyeurs of children, infiltrate many child service providers. We need to protect children within our organisation by ensuring that our Child Protection Policy is fool-proof and implemented effectively, so no opportunities are provided to potential CSA perpetrators. We do this by aiming to:

- Ensure no adult is left alone with a child
- Ensure children are always supervised
- Teach Protective Behaviours to children, caregivers and staff
- Teach caregivers and staff about how to identify Grooming behaviours
- Utilise safety cameras in public access areas, if appropriate
- Adopt a 2 adult to 1 child policy for toileting, bathing and dressing
- Have a Zero Tolerance Policy for voyeuristic behaviours

Sacred Justice Incorporated advocates for all service providers of children with disabilities or neurodivergence to have fool-proof Child Protection Policies. We offer our *Violet's Web Safety and Protection Auditing Tool* to service providers to assess their Child Protection Policies and Procedures against. We advocate for service providers' Child Protection Policies and Procedures to:

- Ensure all staff (and volunteers) have Working with Children Blue Cards and Police Clearances
- Actively educate staff and volunteers about how to identify Grooming behaviours
- Effectively teach Protective Behaviours to children
- Effectively adopt innovative pedagogical methods to teach Protective Behaviours to children with disabilities or neurodivergence
- Have a Zero Tolerance Policy for voyeuristic behaviours
- Have a 2 adult to 1 child ratio for toileting, bathing and dressing
- Reduce interactions between 1 adult to 1 child
- Safety cameras to be installed in every Queensland Residential Facility, Respite Centre, Group Home, Child Care Centre, Special Schools and Hospitals

Violet's Web Program

Violet's Web is a comprehensive community based solution to prevent child sexual abuse (CSA) in our communities. The most effective solutions to prevent CSA includes educating children about protective behaviours; educating staff and caregivers on identifying grooming behaviours and limiting 1 on 1 interactions with children. The most effective solutions for preventing CSA of children with disabilities or neurodivergence includes educating children on protective behaviours with innovative pedagogical approaches; educating staff and caregivers on identifying grooming behaviours; limiting 1 on 1 interactions with children; and installing safety cameras in service providers.

Violet's Web creates visible community groups to undertake *Sacred Justice Protection and Safety Audits* on all child service providers including schools, child care centres, hospitals, churches, medical centres, businesses, clubs and organisations. The 'Web' is a safety net for children to ensure that they are being protected across all service providers they are involved with. When schools and families fail to teach protective behaviours to children, other service providers will deliver the message. Police, Child Safety Departments and Judicial systems are failing to keep our children safe, even after a child's disclosure. This *Evaluation Tool* enables

our communities to take control of this situation to provide a web of protection for children, particularly vulnerable children with disabilities or neurodivergence. Sacred Justice Inc is committed to ensuring service providers have fool-proof child protection policies for non-verbal and minimally verbal children, including Deaf or Hard of Hearing children. No child will fall through the gaps in the Web because if the school isn't delivering the message, the Surf Club will. Service providers are accountable to the community in which they operate because they serve and represent the people. Every child service provider should be comfortable with being assessed and critiqued about their child protection policies and procedures.

Please refer to our ***Violet's Web Safety and Protection Auditing Tool***

Child Safe Environment

Children's safety and well-being are paramount at our service and will be fostered through responsive relationships, engaging experiences and a safe, protective and healthy environment.

Child Safe Code of Conduct for interacting with children and young people

We must take additional care when interacting with vulnerable children who have disabilities or neurodivergence, particularly non-verbal and minimally verbal children, to ensure a child's personal space is respected.

The *SJI Staff Code of Conduct* states that staff and volunteers:

- Are committed to reinforcing protective behaviours in activities; 'My Body Belongs to Me' and 'Having a Strong No'
- Ask children to check in with their body's sensations and the attached feeling it could be, in an attempt to teach them how to read their body's Early Warning Signs
- Not take any photos or videos within the workshop or retreat space
- When we take photos and videos of staff, identifiable images of children will not be featured in any of our promotional material and will be blurred or deleted from the videos or photos
- Do our absolute best to not be alone with a child
- If we find ourselves in a situation where we are alone with a child, we ensure we are visible to other staff members and seek another adult to join the space as quickly as possible
- If a child needs to go to the bathroom or toilet, request their caregiver accompany them or ensure 2 adult staff or volunteers accompany them
- Not bully, harass or discriminate
- Report any misconduct witnessed to the Executive Director or Director
- Have a Working with Children Blue Card and Police Clearance
- Report any disclosures by children about physical or sexual abuse to the Executive Director, Director or Queensland Department of Child Safety.

Behaviour	Appropriate	Inappropriate
Language	<ul style="list-style-type: none"> • Using encouraging/positive words and a pleasant tone of voice • Open and honest communication 	<ul style="list-style-type: none"> • Insults, criticisms or name calling • Bullying, swearing or yelling • Sexually suggestive comments/jokes
Relationships	<ul style="list-style-type: none"> • Being a positive influence • Building relationships based on trust Empowering children and young people to share in decision making 	<ul style="list-style-type: none"> • Favouritism or giving gifts • Spending excessive amounts of time alone with children and young people • Bullying, harassment • 'Grooming' children or young people
Physical contact	<ul style="list-style-type: none"> • Allowing for personal space • Touching due to medical emergency or protecting from physical harm • Non-threatening 	<ul style="list-style-type: none"> • Violent or aggressive behaviour including hitting, kicking, slapping or pushing • Kissing or touching of a sexual nature consistent with 'grooming'
Other	<ul style="list-style-type: none"> • Appropriate attire/clothing for role • Use of internet/mobile phone for work related purposes only 	<ul style="list-style-type: none"> • Using alcohol or other substances before or during work • Inappropriate clothing • Sending inappropriate emails, texts, photos etc.

Blue Card and Police Clearance requirement

All SJI Persons must hold a valid Working with Children Blue Card and Australian Police Clearance. Blue Cards are issued by Blue Card Services, Public Safety Business Agency and the Queensland Government. Forms to apply for a Blue Card may be obtained via the website <http://www.bluecard.qld.gov.au/>.

Records of employee Blue Cards

SJI processes the criminal history checks and Blue Card applications for all new SJI staff, contractors and volunteers. SJI maintains a confidential register containing the personal details and Blue Card details of all existing employees. This register includes detail regarding:

- When the person applied and/or the date of issue of the positive notice and blue card • The expiry date of the blue card, and
- The renewal date (this will be set at least 30 business days before expiry to allow employees to continue working in child-related employment).

SJI maintains a written record of the following information for all SJI staff and volunteers:

- Whether a negative notice has been issued
- Any change in status to a blue card (e.g. a change in police information, the positive notice and blue card is cancelled or suspended)
- When there is a change in police information, when SJI informed Blue Card Services of the change, and
- Any changes of personal information of an employee, including the date they informed Blue Card Services. Within 60 business days of the renewal date for an employee's blue card, SJI notifies the employee that they need to apply for a blue card before that date. SJI sends a follow up reminder within 40 business days. SJI also advises employees, once a year and when reminding them to renew their blue card, that they must notify Blue Card Services using the appropriate form of any change to their personal details within 14 days, highlighting that a failure to notify is an offence.

Notifying Blue Card Services

Where an employee or contractor holding a blue card advises that there has been a change in their police information, SJI is to be informed and will advise Blue Card Services immediately through submitting a change in police information notification form. SJI must not continue to employ the employee or contractor until the form has been submitted and any revised status of the employee's Blue Card is known. Where an employee or contractor stops being employed by SJI, we will also submit a 'no longer with organisation' form to Blue Card Services. Where a person is to relieve/backfill in an SJI position that has been determined as a role requiring a Blue Card, the person must hold a current Blue Card prior to their commencement in the role (regardless of the period of relieving/backfilling). Confirmation occurs when the relevant SJI delegate undertakes the appropriate employment screening checks.

Training

SJI recognises that training in child protection related matters enhances skills and knowledge of employees and contractors and, therefore, minimises the risk of harm to children and

young people. SJI provides support and information to new staff when they begin their role through an induction process. New and existing SJI Persons receive annual training during team meetings and other training exercises in the following areas:

- Identifying, assessing and minimising risks, such as the different types of harm that may occur (e.g. physical, emotional, sexual, psychological abuse and neglect and guidance in relation to the signs and symptoms outlined on the SJI website which may indicate that harm may be occurring
- SJI's policies and procedures
- Compulsory training as required by industry standards or legislation, and
- Handling a disclosure or suspicion of harm, including reporting guidelines.

Procedures to Minimise Harm to children and young people

This section outlines procedures for ensuring that the harm to children and young people is minimised in the following situations:

Physical Contact

We encourage a hands-off policy as much as possible, though children seek touch and affection, and this is understandable. Staff are encouraged to not touch a child first. Typically, child survivors of any type of abuse, particularly sexual abuse, may seek the affection of strangers or people they barely know. This makes them an easy target for future victimisation. It is our job to teach children that they can have relationships with people without being overly affectionate and that this type of behaviour is discouraged in the process of rebuilding personal and body boundaries. If a child approaches staff for affection, it is allowed to an extent and will be observed and monitored by the Executive Director, Director or other staff members within eyesight. Sometimes, this cannot be avoided so your personal judgement is required.

Physical contact with a child and young person should only be to:

- Develop skills in Qi Gong, Martial Arts, Dance or similar activities
- Request permission before touching a child
- Prevent or respond to an injury in an emergency

All physical contact by SJI Persons with a child and young person should:

- Be appropriate for the development of a skill
- Be congratulated or comforted in public, not in an isolated setting
- Not be initiated by SJI Persons, except in accordance with this Policy and Procedure (for example, as set out above)
- Be aware of their proximity to children and young people at all times

- Follow the above dot points when an SJI Person is demonstrating techniques related to specific activities. However, SJI Persons also need to ensure they do not compromise the quality of an activity due to concern over having their actions misconstrued. At all times, SJI Persons should act diligently and conscientiously in their duties, including undertaking activities and demonstrating techniques to children and young people, and
- Where possible, and subject to the nature of the activity and environmental conditions, work with children and young people in groups, rather than on a one on one basis.

Demonstrating technique and/or developing skills

SJI Persons are to demonstrate techniques and/or develop skills relating to a particular activity only in full view of other persons and **never** in private. The following guidelines are to be followed:

- Prior to touching a child or young person: SJI Persons are to give a verbal explanation of how, where, when and why so that the child or young person and other persons can hear.
- Ask the child or young person for permission: After the verbal explanation, SJI Persons are to ask the child or young person if touching for the purpose of carrying out the activity is ok. If permission is granted, the demonstration is to continue.

Being Alone with a Child or Young Person

SJI Persons should not be alone with children or young people and should have at least one other person present (preferably an adult if possible), apart from exceptional circumstances, such as a life threatening situation where first aid is required to be administered.

If a child or young person approaches an SJI Person and wishes to talk privately about a matter, the SJI Person should endeavour to immediately address the situation in an open area and in the sight of other staff members or volunteers.

Ideally, the SJI Person should advise another SJI Person or available Parents and Guardians and ask them to stay within sight while the issue is discussed.

Toilets

Caregivers should accompany their own child to the toilet. If this is not possible, 2 staff members or volunteers should accompany a child to the toilet. If this is not possible, 1 SJI Person will accompany 2 or more children to the toilet, and wait outside the toilet in sight of other staff members or volunteers. The staff member will notify other staff or volunteers prior and request they stay in eyesight.

If an SJI Person is required to enter the bathroom to use the toilet, they should, where possible, notify their supervisor of the fact they are going to enter, and must loudly and clearly

announce to the bathroom occupants they are entering to ensure no participant is in the toilet or bathroom.

For children with disabilities or neurodivergence who require assistance to toilet or dress, 2 SJI Persons (Disability Support Workers) will accompany the child to the bathroom or toilet.

Bathrooms

Caregivers should accompany their own child to the bathroom. If this is not possible, 2 staff members or volunteers should accompany a child to the bathroom for bathing and dressing. If this is not possible, 1 SJI Person will accompany 2 or more children to the toilet, and wait outside the bathroom in sight of other staff members or volunteers. The staff member will notify other staff or volunteers prior and request they stay in eyesight.

For children with disabilities or neurodivergence who require assistance to bathe or dress, 2 SJI Persons (Disability Support Workers) will accompany the child to the bathroom.

Overnight Retreats

SJI Persons are required to have more than one adult with children or young people on an overnight trip/camp. SJI Persons must not isolate themselves with a child or young person at any time. There must always be more than one adult with a group of children or young people, even if the number of children or young people is small. SJI Persons must always obtain separate sleeping accommodation from children and young people (in separate rooms etc.).

In the event that an SJI Person is required to respond to an emergency raised by a child or young person on an overnight trip, the SJI Person should, where possible, attend with another adult to address the issue.

Transport of children and young people

Ideally, all children and young people should have their own transportation to and from events, unless they have written approval. If Parents and Guardians provide written approval for children or young people to be transported by SJI Persons, the SJI Persons should ensure that:

- The travel has been approved by the child or young person's parent/guardian/carer in writing
- The vehicle has 2 SJI Persons accompanying the child or young person
- The SJI Person is not alone with any child or young person in the vehicle at any time.

Appropriate and Positive Language and Behaviours

SJI Persons should seek to adopt positive language and avoid using negative, demeaning or aggressive language, insults, swearing, criticism, bullying or not giving a child positive support and encouragement when talking with a child/young person or in the presence of other children/young people. Additionally, SJI Persons should avoid inappropriate body language, such as winking or leering.

Photographing Children and Young People

At an SJI workshop or retreat, one or two specific SJI Persons are permitted to take photos of events and Staff members. For example, at a workshop, 1 SJI Person will be allocated the role of Photographer. This person will attempt to take photos of Staff members and the back of children's bodies, so they are not identifiable. If SJI take photographs or video recordings that include children's faces and bodies, these will be deleted as a priority. A small selection of appropriate photos or videos may be used as promotional material if the faces of children can be blurred out.

Parents and Guardians are not permitted to take photos of their children in the workshop space or retreat space. Instead, they are encouraged to take photos of their own children outside the venue, away from other children. Parents and Guardians cannot take photos or videos of any child or young person that is not their child/young person.

SJI has photo and video consent forms for parents and guardians to sign, agreeing to print, digital and electronic media (including photographs and video recordings) of their child or young person being used for SJI promotional, training and educational purposes and consent to such media being held as per the terms of the consent.

Phones and Devices

Staff, volunteers and participants are not encouraged to use their phones or devices in the workshop or retreat space. Staff may use their phone to access music for an activity. These devices should not be used to video or take photographs. If participants request a photo of themselves as a keepsake, the allocated staff member may take a photograph to distribute to participants via email at a later date.

For children with neurodivergence or disabilities who rely on their devices as a comfort method to engage in an activity, this will be decided on a case by case basis by the Executive Director, Director or Manager on the day. Many non-verbal children rely on their devices for communication and to engage in activities that involve other people.

Confidentiality

Respecting the privacy of our clients, families, volunteers, contractors, employees and committee members is a basic value of Sacred Justice Incorporated. With additional priority given to the personal information and experiences of clients and families. Child clients should be able to share their stories without fear that their story will be shared with any other person.

Personal and financial information is confidential and should not be disclosed or discussed with anyone without permission or authorisation from the Executive Director or Director. Staff and volunteers cannot discuss a child's or family's personal information with other Practitioners outside of a confidential meeting space specifically organised by the Management Team. Care shall also be taken to ensure that unauthorised individuals do not overhear any discussion of confidential information. If a child client or family member chooses to disclose personal information to a staff member, it is imperative that this information is not shared with anybody else outside of the immediate team. It is expected that a child choosing to share information with a contractor or practitioner is inevitable, but it is expected that a Practitioner will redirect a child to the Executive Director, Director or Mental Health Professional.

Please refer to the Sacred Justice Staff Confidentiality Policy for further information

Injuries and Illness

Only SJI Persons qualified in administering first aid or treating sports injuries should attempt to treat an injury. SJI Persons should avoid treating injuries out of sight of others. Other considerations include:

- The comfort level and dignity of the child or young person should always be the priority
- If necessary, seek medical attention as soon as possible
- Incidences will be recorded in the *SJI Risk Register*
- Write an Incident Report

Smoking, Alcohol and the Use of Illegal Drugs

Smoking and the consumption of alcohol and illegal drugs is prohibited on premises SJI operates from during workshops and retreats.

High and Low Risk Management Activities

SJI Persons responsible for conducting the activity must conduct a Risk Management Plan prior to the activity to support the organisation's *Risk Management Policy*. A risk assessment will be completed for all Workshops and Retreats. SJI Persons are required to undertake the following six steps when conducting a risk assessment:

- Establish the context
- Identify the risks
- Analyse the risks
- Evaluate the risks
- Manage the risks and reassess, and
- Review.

SJI Persons may use the template in the *SJI Risk Register*.

Managing Suspicions and/or Disclosures of Child Abuse or Harm

Policy Statement

SJI is committed to supporting all children and young people who make complaints no matter the nature of the complaint. However, as SJI does not have any powers to act as a law enforcement agency, tribunal, court or child protection agency, it is not in a position to conduct thorough investigations or make a determination as to the substance of an allegation or a complaint of a serious or criminal nature. Any investigation or decision-making function relating to allegations of a serious or criminal nature involving children and young people will be referred to the relevant law enforcement (i.e. Queensland Police Service) or child protection agency (i.e. Department of Children, Youth Justice and Multicultural Affairs). SJI will then take any appropriate steps to mitigate the risk to children until the relevant agency is able to provide further advice as to the necessary actions SJI must take to protect children.

Process

This section sets out the process for managing suspicions and/or disclosures of child abuse or harm.

Reasonable Ground to Suspect Harm

SJI Persons may have 'reasonable grounds' to suspect harm if:

- A child or young person informs an SJI Person that they have been harmed
- Someone else, for example, another child or young person, a parent/guardian/carer, or a staff member, tells SJI Persons that harm has occurred or is likely to occur
- A child or young person informs SJI Persons they know someone who has been harmed. It is possible the child may be referring to themselves
- SJI Persons are concerned at significant changes in the behaviour of a child or young person, or the presence of new unexplained and suspicious injuries, and/or
- SJI Persons witness the harm occurring. If this is the case, intervene immediately, provided it is safe to do so. If it is unsafe, call the police for assistance on 000.

Responding to a Suspicion and/or Disclosure of Harm

All incidents or disclosures of harm or suspicions of harm are to be taken seriously and actioned immediately, regardless of whom perpetrated the harm, in an efficient and effective way. An SJI Person should:

- Not react in a shocked or in a critical way or with disbelief to a disclosure
- Find a private place to talk to ensure confidentiality (preferably in sight of another adult and not in a closed office) and to make the child or young person making the disclosure more comfortable and less concerned

- Not give an assurance to the child or young person that the information provided will be kept secret. SJI Persons are encouraged to advise the child or young person that they have done the right thing in making the disclosure but the disclosure must be reported so that someone can help keep them safe
- Not attempt to conduct their own investigation or mediate an outcome between the parties
- Only ask enough questions to confirm the need to report the matter. SJI Persons should avoid asking probing questions as this could cause distress, confusion and interfere with any later inquiries. For instance, SJI Persons should ask non-leading questions such as “What happened then?” or “Can you tell me about that?” as opposed to leading questions such as “Did X touch you?”
- Act on the basis that the information the person is providing is true
- Ensure the child or young person in question is safe
- Maintain the safety of other children and young people, and/or
- Inform SJI Management or the Executive Director. Any disclosure of harm is important and must be acted upon, regardless of whether the harm to a child or young person has been caused by a person from within or outside the organisation.

Documenting disclosure suspicion and/or disclosure of harm

SJI Persons must immediately document a disclosure/suspicion of harm. In the event that the *Confidential Record of Child Abuse Allegation* is not readily available, the SJI Persons must take comprehensive notes, recording the following information:

- Date and time that record is made
- The name, age and address of child or young person
- Time, date and location of incident
- The complainant (if not the child or young person)
- Who is present (i.e. the complainant, receiver of the complaint and any other person)
- Reason for suspecting abuse or harm (for example observation, injury, information)
- Exactly what the person disclosing said, using “I said..”, “they said”
- The questions asked by the SJI Person
- Any comments the SJI Person made, and
- The actions the SJI Person took following disclosure, including arrangements for the immediate protection of the child or young person. The SJI Person must complete the *Confidential Record of Child Abuse Allegation* as soon as possible and attach their notes to the document.

Reporting Disclosure/Suspicion of Harm

SJI Persons must immediately contact the Executive Director, Director or Manager who will report the suspicion/disclosure to the relevant agency, i.e. the Queensland Police Service and Department of Children, Youth Justice and Multicultural Affairs. As soon as possible, the SJI Person must notify their supervisor or manager who will alert the SJI Executive Director. If the alleged person were to have committed the harm to a child and is an SJI employee,

please follow the process outlined below in the Breach of *Child Protection Policy and Procedure*.

Reporting Witnessed Harm

Where an SJI Person observes actual harm towards a child or young person, the SJI Person must intervene immediately, provided it is safe to do so, and as soon as possible inform the police. If it is unsafe to intervene, immediately call the police for assistance on 000. As soon as possible, the employee/contractor must notify their supervisor or manager who will alert the SJI Executive Director.

Complaint Made relating to Harm to a Child

It is possible that the SJI complaints process may be used by parents or a guardian or other person to report harm to a child or actual harm to a child by an SJI Person. A complaint relating to harm to a child made in person would be treated as a disclosure and the process outlined above would be followed. The process for when an SJI team member receives a disclosure from a child about harm from a parent/guardian/carer is clearly distinguished as being different from a complaint about a harm allegedly committed by an SJI team member. Any complaint about SJI is handled in accordance with the SJI Complaints Policy. Where the complaint involves harm to a child, the process outlined in this Policy and Procedure must be followed.

Actions following a disclosure or suspicion of harm

Under the Child Protection Act 1999, a person who reports suspected child abuse is protected from civil or criminal legal actions and is not considered to have broken any code of conduct or ethics. Details of the person who made the report are to be kept completely confidential and will not be made available to the family of the child or young person, or the person against whom the allegation has been made. If the person who is alleged to have harmed a child or young person is a member of SJI, their duties must be reviewed whilst the person takes an immediate leave of absence from work duties. The Executive Director will seek legal advice to ascertain whether that person can carry out future duties in the organisation.

Complaints Process about Staff

Please refer to SJI's Complaints Policy

Review of Child Protection Policies and Procedures

To ensure that this Policy and Procedure remains current and effective in identifying and minimising risks of harm to children, it is monitored and reviewed annually. This Policy and Procedure will also be reviewed after any incident where a child or young person or is at risk of harm or a breach is identified. Some SJI Persons and Parents and Guardians may be asked to participate in a review. Furthermore, this Policy and Procedure must be reviewed in

its entirety and accurate, complete records must be made of the review, including the date, location of review, who participated in the review and any discussions. The review is to consider any issues SJI has identified with this Policy and Procedure, such as:

- Whether policies and procedures were followed
- Whether any incidents relating to children and young people risk management issues occurred
- Issues with the actual process used to manage any incidents
- The effectiveness of SJI's policies and procedures in preventing or minimising harm to children and young people, and
- Issues with the content and frequency of training. SJI Persons and Parents and Guardians must be advised of any changes to policies and procedures, and training must be provided to SJI Persons if necessary.

Breach of Child Protection Policy

This section outlines the steps to be taken following a breach of this Policy and Procedure in order to address the breach in a fair and supportive manner. A breach is any action or inaction by an SJI Person, Parent, Family, Friend and Guardian who fails to comply with any part of this Policy and Procedure. This includes any breach in relation to:

- Statement of commitment to the safety and well-being of children and the protection of children from harm
- *Staff Code of Conduct* for interacting with children and young people (including the Family and Friends *Code of Conduct*)
- Procedures for recruiting, selecting, training and managing paid employees and volunteers
- Policies and procedure for handling disclosures or suspicions of harm, including reporting guidelines
- Policies and procedures for implementing and reviewing the children and youth risk management strategy and maintaining an employee register
- Risk management plans, and
- Strategies for communication and support. SJI will ensure that SJI Persons and Parents and Guardians are made aware of the actions or inactions that might be considered a breach of this Policy and Procedure, as well as the potential outcomes for a breach.

Process to Manage a Breach

Potential breaches will be managed in a fair, unbiased and supportive manner. The following procedures are to be followed by SJI:

- All people concerned will be advised of the process
- All people concerned will be able to provide their version of events
- The details of the breach, including the versions of all parties and the outcomes will be recorded

- Matters discussed in relation to the breach will be kept confidential (personal information will not be disclosed except where provided for in the relevant policy or process), and
- An appropriate outcome will be decided.

Possible Outcomes for a Breach

Where an SJI Person is alleged to have committed harm to a child, their roles and duties must be reviewed by the SJI Management Committee. Depending on the nature of the breach, outcomes may include:

- Providing additional training to employees relating to the SJI Child Protection Policy and Procedure
- Providing closer supervision of a particular SJI Person and/or review their roles and duties, and
- Consideration of further action or discipline. The complaint or allegation will be referred to the appropriate SJI delegate who will investigate the incident. Any findings by the Management Committee of unacceptable conduct of an SJI employee that does not align with SJI's Code of Conduct can be considered grounds for the termination of employee contract.
- Any breach of the Family and Friends Code of Conduct will result in education of the parent, guardian or friend about SJI's expectations during workshops and retreats.

Other Policies and Procedures

SJI Confidentiality Policy
 SJI Staff Code of Conduct
 SJI Family and Friends Code of Conduct
 SJI Client Complaint Form
 SJI Complaints Policy
 SJI Critical Incident Reporting
 SJI NDS Zero Tolerance Framework
 SJI Records Management Policy
 SJI Risk Management Policy
 SJI Risk Register
 SJI Statement of Participant Rights
 SJI Confidential Record of Child Abuse Allegation