



Procedure

Child Safety Incidents and Complaints

Endorsed by: CEO

Document Owner:

Organisational Management

Section 1: Objective

This procedure ensures that all child safety concerns, incidents allegations, disclosures, and complaints are responded to promptly, appropriately and in a child-focused manner. This procedure outlines how Goulburn Options (GO) identifies, reports, investigates and reviews concerns relating to the safety and wellbeing of children and young people connected to our services. This is in line with GO's Organisational Commitment to Child Safety:

Goulburn Options has zero tolerance for child abuse. We are committed to creating a safe, respectful and empowering environment where all children and young people are protected, heard and supported to thrive. At Goulburn Options, child safety is not just a policy, it's a promise.

This procedure is informed and guided by the Commission for Children and Young People's 11 Child Safe Standards (Victoria), as well as the Reportable Conduct Scheme, and the National Principles for Child Safe Organisations.

It should be read in line with Goulburn Options' **Incident Management Procedure**, and the **Child Safety and Wellbeing Policy**.

For the purpose of this procedure, the difference between a child safety incident and a child safety complaint is as follows:

- A child safety incident is something that happens—or is suspected to have happened—that puts a child or young person's safety, wellbeing, or rights at risk. This could include physical or emotional abuse, neglect, unsafe behaviour, sexual abuse, exposure to family violence or anything that makes a child feel scared, hurt, or unsafe.
- A child safety complaint is when someone speaks up because they are worried that a child or young person has been, or could be hurt, treated unfairly, or made to feel unsafe—either by a person, a decision, or event. It can also be a concern about how a past child safety issue was handled.

1.1 Principles

The following principles underpin this procedure:

- Child safety and wellbeing come first
- Children are listened to and believed
- Zero tolerance for abuse
- Culturally safe practices
- Person-centered approach
- Equity and inclusion
- Accountability and transparency
- Continuous improvement

Section 2: Scope

This procedure applies to all members of the Goulburn Options community, including participants, volunteers, families, carers, staff, contractors and directors, who may engage with, observe or receive information about children and young people in the context of our services.

Section 3: Procedure

3.1 Responding to a Disclosure

A disclosure occurs when a child or young person tells someone, or otherwise makes it known that they have been harmed or abused. This can be quite confronting for all parties involved. The child may be quite nervous, worried or distressed, and the person receiving the disclosure may feel many emotions themselves including anger, sadness and uncertainty.

The person receiving a disclosure (likely a support worker) must remember the following:

- First and foremost, it is your role to be a supportive listener
- It is **not** your role to counsel the child, or investigate their claims, or seek further information. Child protection workers or police will undertake investigations once a report has been made.

The Australian Institute of Family Studies (AIFS) recommends the following steps:

1. **LISTEN** – Move to a suitable environment, free of distractions. Give the child or young person your full attention and listen supportively. Stay calm and patient – allow time for the child or young person to be heard. Let the child or young person use their own words – avoid asking leading questions or ‘quizzing’ them about details of the abuse.
2. **REASSURE** – Reassure the child or young person that they’re doing the right thing telling you what’s been happening. Reassure the child or young person that you believe them. Reassure the child or young person that they are not at fault, and not the cause of any distress that you or others may feel. Address any concerns about the child or young person’s safety.
3. **RESPECT** – Respect that the child or young person may only reveal some details. Acknowledge the child or young person’s bravery or strength for talking about something that is difficult. Avoid making promises you can’t keep – manage the child or young person’s expectations. You will not be able to keep this a secret. Tell the child or young person what you plan to do next. Explain to them that for them to be safe you will need to report their experience to someone else.

Where a child makes a disclosure without the knowledge of their parent or primary carer, and it is appropriate to do so (they are NOT the alleged perpetrator of the abuse/harm) the General Manager and/or CEO will notify them, with guidance from the Police and/or Child Protection.

For further information please see the AIFS’ guide: Responding to children and young people’s disclosures of abuse.

<https://aifs.gov.au/resources/practice-guides/responding-children-and-young-peoples-disclosures-abuse>

3.3 Complaints

All children and young people, regardless of their relationship to Goulburn Options, are welcome and encouraged to provide feedback and make complaints. The complaint of a child or young person will be treated with the same seriousness as that of an adult and be managed through Goulburn Options' internal complaints management system. For full details of this system, please refer to GO's **Complaints, Compliments and Feedback Procedure**.

Not all complaints received from children are child safety complaints. Child safety complaints are those which involve a concern about the health, safety or wellbeing of a child. This complaint could come from the child, or from someone else. In the case a child safety complaint is received, the following process will be enacted:

1. The person receiving the complaint will supportively listen, and act within the scope of their role, as outlined in Section **3.2 Responding to a Disclosure**.
2. The relevant Team Leader receiving the complaint – either directly from the complainant, or via the GO complaints register – will take immediate action to ensure the safety of the child or young person, including removing the person subject of the complaint from contact with children if required.
3. The Team Leader will escalate the matter to the General Manager and CEO for management. The Outcomes Team Leader will be notified to assist in the process and oversight of the review.
4. Mandatory reporting obligations will be considered and enacted without delay. Please refer to GO's Incident Management Procedure for full details of reporting obligations. Where a complaint is reported to an external body, internal investigation and subsequent actions will take place in line with that body's timelines and guidance.
5. Parents and carers will be involved in the complaints process where appropriate and safe to do so. If the complaint involved alleged harm by a parent or carer, involvement will be guided by the Police and/or Child Protection.
6. The complainant (or their representative) will be informed of the outcome and any actions taken, within the bounds of privacy and legal restrictions, as guided by relevant external bodies.
7. The complaint will be formally closed once all actions are complete and a final record made in the **Complaints and Feedback Register**. Opportunities for systematic improvement will be identified and acted on as part of the closure process.
8. Any witnesses or staff members involved in reporting the complaint should be offered a full debrief and access to the GO Employee Assistance Program – Acacia Connection – to support their emotional wellbeing.

3.5 Incidents

Goulburn Options is committed to responding to all child safety incidents – whether observed, suspected or disclosed – with urgency, compassion and in accordance with our legal and organisational responsibilities. Not all incidents involving a child constitute mandatory reporting, for example where a child has fallen over, or has a behaviour of concern and injures themselves. Child safety incidents are, as described here, those which cause harm, the risk of harm or a serious breach of safety or wellbeing as the direct result of **another person's actions, or inactions**.

In the case a child safety incident occurs or is reported, the following process will be enacted:

1. Where a person witnesses a child safety incident (e.g. harm, abuse, neglect) they will immediately contact **Triple Zero (000)** for emergency assistance. Where it is safe to do so, the child should be immediately removed from the environment and taken to a safe location to await the Police. Once emergency services have arrived, the relevant Team Leader should be immediately notified of the situation. The Team Leader will contact the General Manager and CEO immediately.
2. Where a person is told about a child safety incident, they will immediately contact the relevant Team Leader, who will notify the General Manager and CEO. All mandatory reporting obligations need to be followed as per **Incident Management Procedure**. This includes contacting emergency services if the child is in immediate danger or risk of harm. An incident report should be submitted via the Goulburn Options Incident Management system as soon as practicable.
3. For some child safety incidents, Goulburn Options has additional reporting requirements (e.g. NDIS, Worksafe). Please see the GO **Incident Management Procedure** for further information. Wherever an incident meets the reporting requirements of additional reporting bodies, further reports must be made.
4. Parents and carers will be involved in the management of the incident where it is appropriate and safe to do so. If the incident involves a parent or carer as the alleged perpetrator, communication and involvement will be guided by Police and/or Child Protection.
5. Management of internal incident review and subsequent risk mitigation actions will be overseen by relevant external bodies.
6. The child or young person (or their representative) will be informed of the outcome and any actions taken, in a way that is age-appropriate and respectful of privacy and legal requirements. Where appropriate, an advocate or support person will be made available to assist them throughout the process.
7. The incident will be formally closed once all actions are complete, and final documentation recorded in the relevant registers (Incident Register and, if applicable, the Complaints and Feedback Register). Systemic issues or risks identified will be reviewed, and improvements implemented to strengthen child safety.
8. All incidents and complaints have the oversight of the Outcomes Team Leader, as well as a monthly review by the Organisational Management Team. Continuous improvements may result from review by these oversight mechanisms for follow up to strengthen Child Safety at GO.
9. Any witnesses or staff members involved in reporting the incident should be offered a full debrief and access to the **GO Employee Assistance Program – Acacia Connection** – to support their emotional wellbeing.

3.6 Dissatisfaction

Where a person is dissatisfied with how Goulburn Options has managed a complaint, or where they would like to take the matter further, they should be supported to contact the NDIS Quality and Safeguards Commission on 1800 035 544, or TTY 133 677.

Further information can be found at: <https://www.ndiscommission.gov.au/>

Section 4: Roles and Responsibilities

Role	Responsibilities
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Board of Directors	<ul style="list-style-type: none"> • Oversee high-level incidents or complaints involving the CEO or serious organisational issues • Review regular reports relating to child safety complaints/incidents
General Manager/CEO	<ul style="list-style-type: none"> • Ensure immediate and appropriate actions is taken in response to serious child safety incidents or complaints • Notify external agencies as required (e.g. CCYP) • Ensure all mandatory reporting obligations are fulfilled • Notify parents/carers if appropriate and safe to do so
Support Services Team Leaders	<ul style="list-style-type: none"> • Respond immediately to disclosures, complaints or incidents relating to child safety • Take actions to protect children, including removing staff or volunteers from contact if required • Escalate to CEO and General Manager • Liaise with complainants and families • Support incident/complaint review and disclosure • Support access to EAP and debriefing for those involved
Workforce	<ul style="list-style-type: none"> • Act immediately and appropriately to disclosures or concerns • Report all child safety complaints and incidents to relevant Team Leader • Complete incident or complaints forms as soon as practicable • Provide supportive responses to children

Section 5: Related Documentation

Document	Document Type
Complaints, Compliments and Feedback Register	Register
Complaints, Compliments and Feedback QR Code	QR Code
Complaints, Compliments and Feedback Form	Form
Complaints, Compliments and Feedback Pamphlet	Pamphlet
Participant Handbook	Handbook
(Easy Read) Participant Handbook	Handbook
Incident Report Form	Form
VALID Resources	Advocacy resource document (phone numbers and contact details)
(Easy Read) Policy Manual	Policies
Complaints and Feedback Policy	Policy
Child Safety and Wellbeing	Policy
Privacy Policy	Policy
Code of Conduct	Policy
Incident Register	Register
Incident Management	Procedure

Incident Management	Policy
Child Safe Incidents & Reporting Training	Internal Training Resource
Incident Management Step by Step Guide	Internal Training Resource
You Can Talk to Us: Child Safety and Wellbeing at GO	Information Video for Children
Our Commitment to Child Safety and Wellbeing	Information Video for Children

Section 6: Definitions

Term	Definition
Allegation	A claim that an illegal act has occurred. Allegations are always investigated, sometimes by external authorities (e.g. police)
Concern	A notification that a person is worried something is not working, has gone wrong, or is otherwise not as it should be.
Complaint	An expression of dissatisfaction with a service or support, including how a previous complaint was handled, expecting a response or resolution.
Feedback	Information about a person, service or location used as a basis for improvement.
Advocate	A person who supports or presents someone in the complaints or feedback process. This can be a trusted staff member, family or an external advocate.
Child Safety Complaint	When someone speaks up because they are worried that a child or young person has been, or could be, hurt, treated unfairly, or made to feel unsafe. This includes concerns about how a past child safety issue was handled.
Child Safety Incident	Something that happens—or is suspected to have happened—that puts a child or young person's safety, wellbeing, or rights at risk. This could include abuse, neglect, unsafe behaviour, or exposure to harm.
Reasonable Belief	A reasonable belief is when a person believes that a child has been, or is likely to be, harmed or abused, and that belief is based on facts or observations that would lead a reasonable person in the same position to form the same conclusion. You do not need to have proof to form a reasonable belief. It is enough to have seen signs, heard something, or noticed behaviour that causes concern.

Date of Last Review:	August 2025	Date of Next Review:	August 2027
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