



Bacchus Marsh
Grammar

ELC POLICY

Early Learning Centre Child Safe Code of Conduct

Approved by the Approved Provider: 26 August 2025

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Child Safe Code of Conduct

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1 Purpose and Background

- 1.1.1 To state our rules and expectations for child safe behaviour in our service, and to outline the likely action we will take in the event of any breaches.
- 1.1.2 We are required to have a Code of Conduct under the Education and Care Services National Regulations.
- 1.1.3 A code of conduct is required under the Victorian Child Safe Standards. This Code of Conduct also helps to fulfil our obligation under the Reportable Conduct Scheme to have systems in place to prevent and respond to child abuse.
- 1.1.4 This code of conduct aligns with the ECEC Code of Ethics and the National Model Code for Taking Images or Videos of Children while Providing Early Childhood Education and Care (National Model Code)

2 Scope

- 2.1.1 This code applies to:
 - 'Staff': the approved provider, nominated supervisor, paid workers, volunteers, work placement students, and third parties (e.g., contractors, subcontractors, self-employed persons, employees of a labour hire company) who perform work our behalf
 - Visitors to our service who carry out child-related work, including allied health support workers
- 2.1.2 This Code applies to all behaviour and conduct that is reasonably related to or connected with our service, including our day-to-day operations, service hosted events where there are children present, excursions, and the use of technology. It is not limited to behaviour within the physical workplace or during normal business hours
- 2.1.3 This Code should be read in conjunction with our Child Safe Environment Policy and Child Protection Policy
- 2.1.4 The Staff Code of Conduct also applies to staff
- 2.1.5 The Families and Visitors Code of Conduct applies to families and visitors

3 Definitions

- 3.1.1 The following definitions apply to this policy and related procedures:
 - a) 'Breach' means any action or inaction that fails to comply with this Code
 - b) 'Child-related work' is used in this Code to refer to the work of our service (an education and care service for children). It does not apply where contact with children is incidental or would not reasonably be expected to occur (e.g. a plumber or delivery driver who are supervised at all times)
 - c) 'Harm' and 'risk of harm' are used in this policy as overarching terms that cover neglect and various forms of abuse. It includes physical, sexual and psychological abuse; neglect; ill-treatment; grooming; exposure to family violence; commercial child sexual exploitation; online child sexual abuse; and sexual abuse that is perpetrated by other children and young people
 - d) 'Parents' includes guardians and persons who have parental responsibilities for the child under a decision or order of court
 - e) 'Staff' refers to approved provider, nominated supervisor, paid employees, volunteers, students, and third parties who are covered in the scope of this policy – unless indicated otherwise

4 Child Safe Code of Conduct

- 4.1.1 Our Child Safe Code of Conduct is at Appendix A. - full version is at **Appendix A**; a quick summary version is at **Appendix B**
- 4.1.2 It provides examples of the behaviour we want our staff to engage in and the behaviour that is unacceptable. Engaging in unacceptable behaviour is a breach of our Code and may result in performance management or disciplinary action.



- 4.1.3 Examples of concerning behaviour are also described. On its own, a concerning behaviour may not be a breach of the Code; however, a pattern of concerning behaviour may pose a risk to children and be deemed a breach.

5 Code, Communication, Training and Monitoring

- 5.1.1 This Child Safe Code of Conduct can be found on the BMG Web site, Policy folder in the Gallery and on the staff One drive Policy file.
- 5.1.2 The approved provider and nominated supervisor provide information, training and other resources and support regarding the Child Safe Code of Conduct and related documents.
- 5.1.3 All staff (including volunteers and students) are formally inducted. They are given copies of/access to, review, understand and formally agree to uphold this Child Safe Code of Conduct and related documents.
- 5.1.4 The approved provider runs a professional development program (Complispace) for each staff member, which covers this Code.
- 5.1.5 The approved provider and nominated supervisor monitor the Child Safe Code of Conduct and staff practices to ensure our staff are understand and uphold the Code The approved provider and nominated supervisor monitor and audit staff practices. They address non-compliance. Breaches are taken seriously.
- 5.1.6 Families are given access to our Child Safe Code of Conduct and related documents at the time of enrolment and any other time upon request
- 5.1.7 Families are notified in line with our obligations under the National Regulations when changes are made to our policies and procedures, including this Child Safe Code of Conduct.

6 Related Documents

6.1 Key Policies

Child Protection Policy | Child Safe Environment Policy | Child Safe Risk Management Plan | Recruitment, Induction and Training Policy | Complaint Handling Policy | Excursions Policy | Family Violence Safety Policy (VIC) | Tobacco, Vape , drug and Alcohol- Policy | Safe Arrival of Children Policy | Transport Policy | Sleep, Rest and Relaxation Policy | Managing Emergencies and Evacuations Policy | Incident, Injury, Trauma and Illness Policy | ECEC Code of Ethics | Physical Environment Policy | Educator and Management Policy | Staffing Arrangement Policy | Social Media Policy | Technology and Device Use Policy | Photography and Video Policy | Work Health and Safety Policy | Relationships with Children Policy | Orientation for Children Policy | Family and Community Partnerships Policy | Governance and Management Policy | Privacy and Confidentiality Policy | Delivery and Collection of Children Policy | Lock Up Policy | Collection and Delivery of Children Policy | Staff Code of Conduct | Family and Visitors Code of Conduct | Visitors Policy | Bullying, Harassment and Discrimination Policy

6.2 Procedures / Plans

Complaint Handling Procedure (in Complaint Handling Policy) | Child Protection Procedures (in Child Protection Policy)

6.3 Templates / Resources

Incident, Injury, Trauma and Illness Record template (in Incident, Injury, Trauma and Illness Record Policy)
Recording disclosures of harm/risk of harm template (in Child Protection Policy),
Recording suspicions of harm/risk of harm template (in Child Protection Policy)
Child Safety and Wellbeing Breach – Incident Report Form (in Child Protection Policy)
List of indicators of harm (in Child Protection Policy)
Child protection reporting summary (in Child Protection Policy)
Centre Support resources available on Karla Resources at centresupport.com.au



7 Authorisation

ELC Document Name	Child Safe Code of Conduct	
Name of Reviewer: Approved Provider	CEO Andrew Neal	Signature:
Name of Reviewer: Nominated Supervisor	Kerry Osborn	Signature:
Date Revised	August 2025 Reviewed annually and when there are changes that may affect this policy or related procedures. The review will include checks to ensure the document reflects current legislation, continues to be effective, or whether any changes and additional training are required	

8 History

Date	Amendment
January 2023	1. School Child Safe Code of Conduct in place
July 2024	2. New ELC Child Safe Code of Conduct implemented to replace the School's Child Safe Code of Conduct.
September 2024	3. Minor updates – see highlighting within the Policy. Updated to include reference to the new National Model Code. Privacy Act in legislation table made to apply to all services Updated policy titles in Related Policies section
July 2025	4. Policy update/ also reflecting new policies
August 2025	5. Strengthened supervision section in response to customer feedback. Now has flexible options for services, depending on their arrangements 6. Updated references to vaping

9 Appendix A: Child Safe Code of Conduct

9.1 Commitment to Child Safety and Wellbeing

Bacchus Marsh Grammar Early Learning Centre

Child Safety Commitment Statement

Bacchus Marsh Grammar Early Learning Centre is committed to the safety and well-being of all children and young people. We understand our responsibilities and statutory duty of care to comply with both the Victorian Child Safe Standards and the Reportable Conduct Scheme to build our capacity as an organisation to prevent and respond to allegations of child abuse.

Our Service is committed to implementing and abiding by our Child Safe Policy based on Child Safe Standards in Victoria (2022), accentuating our zero tolerance for child abuse and raising awareness about the importance of child safety in our Service and the community. We are dedicated to protecting children from abuse and neglect and promoting a child-safe environment, maintaining children's well-being.

We adhere to our comprehensive Child Protection Policy, following our mandatory reporting responsibilities to protect children from physical, sexual, emotional, and psychological abuse and neglect.

We are dedicated to promoting cultural safety for Aboriginal children, cultural safety for children from culturally and/or linguistically diverse backgrounds and providing a safe environment for children with a disability. We are committed to ongoing professional development for employees to maintain their ability to distinguish and respond to situations of abuse and neglect, ensuring employees are responsive to their responsibilities in keeping children safe.

We work in collaboration with the United Nations Convention on the Rights of the Child and have confidence in educating children about their right to be safe. At Bacchus Marsh Grammar Early Learning Centre, we know that children learn best when they feel safe and are safe. We believe in teaching children what to do if they feel unsafe and encouraging them to express their views and thoughts on matters that directly affect them. As educators, we listen to and empower children to act on any concerns they or others may raise, which is reflected in our policies and procedures for keeping children safe

Commitment to child safety and legal obligations

I WILL:

- Uphold our commitment to child safety and wellbeing
- Put children's safety, health and wellbeing first at all times, remembering my duty of care to protect children from hazards and harm
- Act in line with all relevant laws and regulations, including the Child Safe Standards

- – Be responsible for knowing and following all the relevant child safety and protection policies and procedures that apply to my role, including our policies and procedures, including our Child Safe Environment Policy and those that cover supervision practices, interactions with and between children, child protection, discrimination, bullying and harassment, communication (including online), technology use, photography, privacy and record keeping
- Be aware of current child safety and protection laws and my obligations under them, and undertake all the training I need
- Meet my child protection reporting obligations including mandatory reporting, and reporting criminal conduct, allegations of sexual misconduct, allegations of reportable conduct
- Keep all information about child protection concerns confidential, except when it must be disclosed by law to a relevant authority under information sharing laws
- Identify, assess ~~report~~ and manage risk of harm to children in line with our Child Safe Risk Management Plan and our other risk assessments, policies and procedures
- Take a child seriously if they make a disclosure about harm or risk of harm concerning themselves or another child
- Manage allegations of a child exhibiting harmful sexual behaviour
- Respond to all suspicions, beliefs, disclosures, incidents, allegations, concerns and complaints about child safety, including harm or the risk of harm following the relevant policy and procedure, including (see-our Child Safe Environment Policy, Child Protection Policy and Procedures and Complaint Handling Policy and Procedure)
- Use positive behaviour management for children who are exhibiting challenging or inappropriate behaviour

I WILL NOT:

- Condone or engage in any activity that harms or risks harm to a child including:
 - Physical, sexual or psychological/emotional abuse
 - Verbal abuse or intimidation, such as yelling and shouting, invading a child's personal space, finger pointing, talking over, persistently criticising and/or denigrating, humiliating, shaming or name calling
 - Ill-treatment
 - Neglect (e.g., inadequate supervision, nourishment, water, education or medical care)
 - Sexual grooming, commercial child sexual exploitation, online child sexual abuse
 - Bullying
 - Harassment
 - Unlawful discrimination
 - Use passive aggressive behaviour, such as deliberately ignoring, isolating or being dismissive of others
 - Deliberately prevent a child from forming friendships
 - Engaging in rough physical games with children that could lead to injury
 - Any other unsafe behaviour towards a child
- Use corporal punishment or other forms of inappropriate discipline, including:
 - Smacking, pushing, hitting, pinching or biting
 - Force feeding
 - Yelling, belittling or humiliation
 - Physically dragging a child
 - Locking a child away (or isolating them)
 - Depriving a child of food or drink
 - Unreasonable restraining or immobilisation of a child
 - Excluding children from events

- Consistently moving children to the office or other space away from the play areas
 - Moving children to another room as punishment>
- Use any other form of inappropriate practice, such as:
 - Negative labelling of a child or family
 - Criticising a child's actions or behaviour
 - Discouraging a child from taking part in activities
 - Blaming or shaming a child
 - Making fun of or laughing at or about a child
 - Using sarcastic or cruel humour with or to a child
 - Excessive use of negative language to a child, such as, "no" or "stop that!" or "don't..." or "you never..."
- Ignore or disregard any incidents, suspicions, disclosures or knowledge of harm or risk of harm to a child
- Talk with other adults about hurting a child
- Exaggerate or trivialise harm or risk of harm to children

Professional conduct and boundaries

I WILL:

- Behave in a courteous, ethical and respectful way towards children and their families
- Use non-intrusive physical contact with a child when it is warranted, such as to soothe, build trusting relationships, demonstrate learning, treat or prevent an injury, and to meet the health and hygiene needs of a child or the needs of a child with disability
- Report any actual or perceived conflicts of interest to the nominated supervisor (such as an outside relationship with a child in our care)
- Maintain a professional appearance and proper
- Communicate in a polite and respectful way, verbally and in written material (e.g. emails, social media)
- Be aware that purposely forming relationships with families outside of work may be perceived as grooming behaviour

I WILL NOT:

- Condone or engage in any sexual act with or towards a child, any sexual touching, voyeurism, recording or distributing intimate images, grooming or inappropriate behaviour in relation to a child in our care, including the following:
 - Offer a child gifts, food, money, attention or affection in exchange for sexual activities or images or with the intention of making it easier to access the child for sexual activity
 - Discuss my sexual experiences and preferences with a child or ask a child to share intimate or sexual information about themselves
 - Show children pictures, animations, images or websites of an inappropriate or adult nature
 - Undress in front of, or expose myself to, a child
 - Go to the toilet in front of a child
 - Communicate with a child about romantic, intimate or sexual feelings
 - Initiate inappropriate and unwarranted touching, such as massages, kisses or unwelcome hugging
 - Deliberately facilitate situations that unnecessarily result in close physical contact with a child, such as wrestling or tickling
 - Make negative, overly flattering or sexualised comments about a child's appearance



- Flirt with a child
 - Undress a child unless it is necessary to do so, and the child is unable to undress themselves
 - Form any intimate relationship with a child in our care
- Talk about adult or sexualised topics – including telling adult jokes, or use sexual language or gestures in the presence of children
- Do personal care tasks that a child can do for themselves, such as toileting
- Engage in any sexual or intimate acts with anyone while at the service or during work-related activities outside the premises (e.g. excursions, staff development activities)
- Encourage a child to communicate or meet with me in a private setting, or arrange personal contact, including online, with children in our care for any purpose that is not related to our service's activities unless I have prior approval from the nominated supervisor or approved provider and the child's parent/s
- Babysit, mentor and/or tutor a child in our care out of work hours unless I have the nominated supervisor or approved provider's prior approval
- Develop any special relationships with children that could be seen as favouritism
- Ask a child to keep a secret, including a relationship with an adult

Photography, social media, electronic devices and technology

I WILL:

- Follow our policies and procedures for photography, social media, and using electronic devices and online platforms
- Get consent from parents before photographing or recording a child or using their image
- Only use service-issued devices to take photos or make recordings of children
- Keep my personal devices securely stored away from children
- Only connect with children online in relation to my work and include the child's parent in any electronic communication with a child

I WILL NOT:

- Have personal devices capable of taking images or videos (such as cameras, smartphones, tablets, and smartwatches) and personal storage and file transfer media (such as SD cards, USB drives, and cloud storage) in my possession while providing education and care and working directly with children (unless I have been authorised otherwise)
- Take or store photographs or recordings of a child on personal devices/online storage for personal use
- Take, access, share, store, publish photographs or recordings of a child without the written consent of their parent/s
- Have unauthorised contact with a child online
- Use private text messages to communicate with a child where open communication is possible
- Use an electronic device to exploit or harass a child or their family
- Take or distribute explicit or intimate images or recordings of a child, including those in which they are in a state of undress, bathing or using the toilet
- Access, retrieve, display, view, forward and/or store offensive obscene, pornographic, threatening, abusive or other inappropriate material in the workplace

Cultural safety and inclusion

I WILL:

- Welcome and celebrate all children (and their families and communities), regardless of their race, colour, sex, gender identity, sexual orientation, language, religion, political or other opinion, health status, national, ethnic or social origin, culture, property, ability or other status
- Acknowledge the histories, cultures, language, traditions, religions, spiritual beliefs, child rearing practices and lifestyle choices of Aboriginal and Torres Strait Islander children and their families
- Make reasonable adjustments for children who have different needs, such as a disability
- Take part in discussions and share knowledge about cultural safety with my colleagues
- Communicate in ways children (and their families and communities) can understand

I WILL NOT:

- Treat a child (or their family) unfairly or unfavourably because they have a particular characteristic or belong to a certain group, such as disability, sex, race, age, gender identity, sexual orientation, age, religious appearance
- Express my personal views about gender, gender identity, sexual orientation, culture, race, religion, or disability in front of children in any way that might negatively impact them
- Use offensive language, or racial, cultural, homophobic or sexist slurs

Supervision

I WILL:

- Strictly follow our supervision procedures and plans, including during high-risk activities e.g., during the delivery and collection of children, travel between services, excursions, transport, nappy changing and toileting, water-play, special events with visitors, sleep and rest etc.
- Work with children in an open and transparent way, so that the other adults know what work I am doing with children
- Always stay within the line of sight of other staff while I am working with children
- Ensure that I am within the line of sight of other staff at all times while I am carrying out intimate care routines with a child (including nappy changing, toileting, sleep and rest, changing clothes)
- Avoid being alone with a child and try to stay in the line of sight of other staff members when I am working with children (including during travel or transport)
- Report to the nominated supervisor any situations in which I am or another staff member is out of the line of sight of other staff while I am working with children
- Raise any concerns I have about supervision with the nominated supervisor or approved provider

Alcohol, drugs and tobacco

I WILL:

- Follow our [Alcohol, Vape, Drugs and Tobacco Policy](#) and keep our service free of these substances

I WILL NOT:

- Be affected by or in possession of alcohol or illicit drugs (including misused prescription medication) while I am at work
- Smoke or use e-cigarettes (vapes) at the service, in the carpark, or within 4 metres of the pedestrian entrances/exits from our service
- Offer children and young people alcohol, cigarettes, vapes or illicit drugs

Breaches of this Code of Conduct

Breaches and suspected breaches of our Child Safe Code of Conduct must be reported as soon as practicable to the nominated supervisor and/or approved provider either in person, by telephone on 5366 4999 or via email woodleaelc@bmg.vic.edu.au or principal@bmg.vic.edu.au

If the breach relates to harm or the risk of harm to a child, staff must follow our [Child Protection Policy and Procedures](#). Staff should complete the Child Safety and Wellbeing Breach – Incident Report Form which is available on the ELC One Drive policy file in the Child Safe Environment Policy / child safe protection templates or the policy folder (Child Safe Environment Policy) in the gallery

Breaches and suspected breaches will be taken seriously and dealt with quickly, fairly, transparently and according to our relevant policies and procedures, including our HR/management policies, our Complaint Policy and Procedure and Child Protection Policy and Procedure, where appropriate.

Staff, including volunteers and students, who breach our Code may have disciplinary action taken against them, such as formal warnings, increased supervision, being transferred to another role, or having their employment suspended or terminated.

Depending on the breach, we may need to refer the matter to the police and/or another relevant authority.

Reporting requirements

In Victoria:

- Mandatory reporting laws require us to report reasonable beliefs that a child is in need of protection because they have suffered or are likely to suffer significant harm as a result of physical injury or sexual abuse and the child's parents have not, or unlikely to protect, the child
- There are criminal offences relating to failing to disclose information to police about child sexual offenses and failing to protect children against the risk of sexual abuse
- The Reportable Conduct Scheme requires the approved provider to report allegations of child abuse (and other child-related misconduct) made against their workers and volunteers, irrespective of whether it relates to their employment or activities at the service

Our [Child Protection Policy and Procedures](#) detail our legal obligations and set out how to respond to incidents, disclosures and suspicions of harm and risk of harm, and how to make reports to the relevant authorities

Agreement and signature:

I have read and understood this [Child Safe Code of Conduct](#) and agree to abide by it and its terms:

Name:

Signature:

Date: