

Child Safe Reporting Procedure

A New Way Services INC

Version 1.1 - 2026

1. Purpose

This procedure sets out the steps A New Way Services INC (ANW) will follow when a child protection concern, complaint, disclosure, allegation or other information relating to the safety of a child is received.

Child protection concerns may include:

- a child who may be at risk of significant harm;
- physical abuse;
- sexual abuse;
- sexual misconduct involving a child;
- serious neglect;
- psychological or emotional harm;
- grooming;
- inappropriate personal or intimate communication;
- exposure to domestic or family violence;
- reportable conduct;
- a child abuse offence; or
- any other behaviour or circumstances that cause concern for the safety or wellbeing of a child.

This procedure is intended to ensure concerns are responded to promptly, appropriately and in accordance with ANW's legal obligations.

2. Scope

This procedure applies to:

- all ANW employees;
- all volunteers;
- Board members;
- contractors and other people formally representing ANW; and
- all ANW programs, activities, services and events involving children.

This procedure applies whether the concern relates to:

- an ANW staff member or volunteer;
- another participant;
- a parent or carer;
- a person from another organisation;
- a family or household member;
- a person outside ANW; or
- circumstances where the identity of the person responsible is unknown.

A child means a person under 18 years of age.

3. Related ANW Documents

This procedure should be read alongside:

- Safe Community Policy;
- Child Safe Policy;
- Code of Conduct;
- Procedure for Handling Serious Complaints Against Staff and Volunteers;
- Complaints & Feedback Policy;
- Child Safe Recruitment, Induction and Training Policy;
- Child Safe Risk Management Plan; and
- Privacy Policy.

Where a concern involves alleged misconduct by an ANW staff member or volunteer, the Procedure for Handling Serious Complaints Against Staff and Volunteers may also apply.

4. Everyone Must Act

Child safety is everyone's responsibility.

Staff and volunteers do not need to determine whether abuse has definitely occurred before raising a concern.

A person should report information whenever they:

- receive a disclosure;
- observe concerning behaviour;
- receive information from another person;
- become aware of an allegation;
- have reasonable concerns about a child's wellbeing; or
- otherwise become aware of circumstances that may place a child at risk.

ANW staff and volunteers must not ignore a concern because they believe someone else will report it.

5. Receiving a Child Protection Concern

A child protection concern may be received:

- directly from a child;
- from an adult who witnessed or experienced relevant conduct;
- from a parent or carer;
- from another child or young person;
- from another organisation;
- from another staff member or volunteer;
- through observations of a child's behaviour or circumstances; or
- through information obtained in the course of ANW's work.

A child does not need to use words such as "abuse" or "unsafe" for information to constitute a child protection concern.

6. Responding to a Disclosure

If a child or another person raises a concern or makes a disclosure:

DO:

- stay calm;
- listen carefully;
- take what they are saying seriously;

- allow them to speak in their own words;
- clarify information only where necessary;
- use open questions such as "Can you tell me more about that?";
- reassure the child that it was appropriate to tell someone;
- explain that information may need to be shared with people who can help keep them safe;
- consider whether the child is in immediate danger; and
- record what was said as accurately as possible.

DO NOT:

- promise secrecy or absolute confidentiality;
- ask leading questions;
- pressure the person for more information;
- investigate the allegation yourself;
- confront the person alleged to have caused harm;
- make promises about what will happen next;
- dismiss, minimise or question the person's credibility; or
- discuss the matter unnecessarily with other people.

The role of the person receiving a disclosure is to **listen, protect, record and report**, not to investigate.

7. Immediate Danger

If there is an immediate or life-threatening danger to a child:

1. Contact emergency services on **000**.
2. Follow any instructions provided by Police or emergency services.
3. Take reasonable steps to address the immediate safety of the child and other people present.
4. Arrange appropriate support for the child.
5. Notify the ANW Director or designated child-safety contact as soon as practicable.
6. Record what occurred and the actions taken.

Internal reporting requirements must never delay emergency action.

8. Initial Internal Reporting

Any ANW staff member or volunteer who receives or identifies a child protection concern must report it as soon as practicable to:

- the Director; or
- the person designated by ANW to manage child-safety concerns.

Where the concern involves the Director, it must instead be reported to the Chairperson of the Board.

Where the concern involves the Chairperson, it should be reported to another Board member.

A person must not be required to report a concern to someone who is the subject of the allegation.

9. Recording the Concern

A written Child Safety Concern Record should be completed as soon as possible.

The record should include, where known:

- the child's name;
- the child's age or date of birth;
- the date and time the concern arose;
- who raised the concern;
- the circumstances in which it was raised;
- the person's exact words where possible;
- observations made by the person receiving the information;
- the name of the person alleged to have caused harm, if known;
- details of any immediate safety concerns;
- actions already taken;
- external agencies contacted;
- reference numbers for reports made; and
- the name and signature of the person completing the record.

Records should distinguish between:

- what the child or another person said;
- what was directly observed; and
- the recorder's own opinion or interpretation.

10. Do Not Notify the Alleged Person

Staff and volunteers should not inform the person alleged to have harmed the child that a complaint or concern has been raised unless authorised to do so.

Prematurely notifying that person may:

- increase risk to the child;
- result in evidence being destroyed;
- influence witnesses;
- interfere with a Police or regulatory investigation; or
- place another person at risk.

Any communication with the respondent should be managed through the appropriate ANW complaint or investigation process.

11. Initial Risk Assessment

After receiving a child protection concern, ANW must consider whether immediate protective action is required.

This may include considering:

- whether the child remains in contact with the person of concern;
- whether other children may be at risk;
- whether the alleged conduct could continue;
- whether the person of concern has access to ANW programs;
- whether emergency services should be contacted;
- whether external authorities should be notified; and
- whether an ANW worker or volunteer should be temporarily removed from child-related duties.

Protective measures may be implemented before an allegation has been investigated. Such measures are precautionary and do not constitute a finding of wrongdoing.

12. External Reporting

Different types of child protection concerns may require reports to different government agencies.

More than one external report may be required in relation to the same matter.

Depending on the circumstances, reports may need to be made to:

- NSW Police;
- the NSW Department of Communities and Justice;
- the NSW Office of the Children's Guardian; or
- another relevant authority.

ANW's internal processes do not replace any legal responsibility held by an individual staff member, volunteer, mandatory reporter or other person.

13. Risk of Significant Harm

Where there are reasonable grounds to suspect that a child is at risk of significant harm, the matter should be assessed in accordance with NSW child-protection requirements.

A risk of significant harm may arise from circumstances including:

- serious physical abuse;
- sexual abuse;
- serious neglect;
- serious psychological harm;
- domestic or family violence;
- failure to provide necessary medical care;
- failure to provide necessary education; or
- other serious threats to a child's safety, welfare or wellbeing.

Where applicable, ANW staff or volunteers who are mandatory reporters must meet their individual reporting obligations.

The NSW Mandatory Reporter Guide may be used where appropriate to assist in determining the required response.

Where a report is required, it should be made to the NSW Child Protection Helpline or through the applicable online reporting process.

14. Reporting Suspected Criminal Conduct

Where information indicates that a child abuse offence or another serious criminal offence may have occurred, consideration must be given to reporting the matter to NSW Police.

Staff and volunteers must not conduct their own investigation to determine whether a criminal offence has occurred before considering whether information should be reported.

Reports to Police may relate to:

- recent conduct;
- historical child abuse; or
- information concerning an offence that occurred outside an ANW program.

Where there is uncertainty about reporting obligations, ANW should obtain appropriate legal or professional advice.

15. Reportable Conduct

Where ANW is an entity covered by the NSW Reportable Conduct Scheme and a reportable allegation is made concerning a relevant worker, ANW must follow the applicable requirements of the Children's Guardian Act 2019 (NSW).

Reportable conduct may include:

- sexual offences;
- sexual misconduct;
- ill-treatment of a child;
- neglect of a child;
- assault of a child;
- certain offences relating to child abuse; and
- behaviour causing significant emotional or psychological harm to a child.

The person designated as ANW's Head of Relevant Entity, or a lawful delegate where permitted, is responsible for ensuring required notifications and reports are made to the NSW Office of the Children's Guardian.

Where the matter also involves alleged misconduct by an ANW staff member or volunteer, ANW's Procedure for Handling Serious Complaints Against Staff and Volunteers must also be followed.

16. Multiple Reporting Obligations

A single child protection concern may require separate reports to:

- Police;
- the Department of Communities and Justice;
- the Office of the Children's Guardian;
- another regulator; and
- ANW internally.

A report to one organisation does not automatically satisfy an obligation to report to another. The person managing the matter should keep a clear record of:

- what reports were considered;
- what reports were made;
- when each report was made;
- who made the report;
- any reference number provided; and
- any instructions received.

17. Interaction With External Investigations

Where Police, the Department of Communities and Justice, the Office of the Children's Guardian or another authority becomes involved, ANW will cooperate appropriately.

ANW must take care not to interfere with an external investigation.

This may require ANW to:

- delay interviewing particular people;
- avoid notifying the respondent immediately;
- preserve records;
- follow directions from Police or another authority; or
- adjust its internal investigation process.

ANW may still take reasonable interim action to protect children while an external investigation is underway.

18. Concerns About ANW Staff or Volunteers

Where a child protection concern relates to an ANW staff member, volunteer, Board member or other representative:

- the child's immediate safety must be considered first;
- external reporting requirements must be considered;
- an immediate risk assessment must be completed;
- ANW may restrict or suspend the person's child-related duties;
- the matter must be referred through the Procedure for Handling Serious Complaints Against Staff and Volunteers; and
- appropriate records must be maintained.

Where a plausible allegation involves sexual abuse, grooming, serious physical abuse or other serious harm to a child, the respondent should ordinarily be removed from child-related duties while the matter is assessed.

19. Support for the Child

ANW should consider what support the child may require after a concern has been raised. This may include:

- ensuring the child is with a safe adult;
- contacting a parent or carer where appropriate;
- connecting the child or family with specialist services;
- modifying the child's participation in a program;
- implementing additional supervision;
- protecting the child from unnecessary contact with the respondent; or
- making other reasonable adjustments.

Care should be taken before contacting a parent or carer where there is reason to believe that doing so could increase risk to the child or interfere with an external investigation.

20. Support for the Person Making the Report

ANW should provide appropriate support to a person who makes a child protection report or receives a difficult disclosure.

This may include:

- checking on their wellbeing;
- providing information about the process;
- providing appropriate debriefing;
- identifying counselling or professional support where required; and
- ensuring they understand what information must remain confidential.

21. Feedback to the Initial Reporter

Where reasonably appropriate, ANW should confirm with the person who initially raised the concern that the matter has been received and acted upon.

Information provided back to that person may include:

- confirmation that the concern has been recorded;
- confirmation that relevant safety steps have been taken; or
- confirmation that an external report has been made.

ANW may not be able to provide detailed information about another person's circumstances, investigation or disciplinary action because of privacy, confidentiality, legal or procedural fairness requirements.

22. Individual Reporting Responsibilities

Internal reporting to ANW does not remove any individual legal reporting obligation that may apply to a staff member, volunteer or other person.

If a person believes they personally have an obligation to make a report, they should not assume that reporting the matter internally has satisfied that obligation.

Where appropriate, ANW should assist the person to understand the relevant reporting pathway.

23. Confidentiality

Child protection information must be handled sensitively.

Information should only be disclosed to people who reasonably need it to:

- protect a child;
- make a required report;
- manage the concern;
- conduct an investigation;
- provide procedural fairness;
- obtain professional or legal advice; or
- fulfil governance responsibilities.

ANW cannot promise absolute confidentiality in relation to child protection concerns. Privacy must not be used as a reason to prevent a lawful or required report.

24. Record Keeping

ANW will maintain secure records of child protection concerns and actions taken.

Records may include:

- Child Safety Concern Records;
- disclosure notes;
- Mandatory Reporter Guide outcomes;
- Police reports;
- Department of Communities and Justice reports;
- Office of the Children's Guardian notifications;
- correspondence;
- risk assessments;
- investigation records;
- decisions;
- external report reference numbers; and
- contemporaneous notes of actions taken.

Access must be limited to authorised people.

Child protection records must not be destroyed simply because:

- the child reaches adulthood;
- a worker or volunteer leaves ANW;
- a program ends; or
- an allegation is not substantiated.

Records must be retained in accordance with applicable legal requirements and ANW's record-keeping requirements.

25. No Retaliation

No person may be threatened, punished, disadvantaged or subjected to retaliation because they:

- raise a genuine child-safety concern;
- make a mandatory report;
- report suspected criminal conduct;
- cooperate with an investigation;
- provide evidence; or
- support a child who has made a disclosure.

Any retaliation may itself constitute serious misconduct.

26. Child Safety Contact

ANW will nominate an appropriate person or position to coordinate child-safety concerns.

Primary child-safety contact:

Director, A New Way Services INC

Email: lewis@anewway.org.au

Phone: 0458384807

Alternative contact where the Director is involved:

Chairperson, A New Way Services INC

Email: chair@anewway.org.au

Where there is immediate danger, contact emergency services on **000**.

27. Simple Reporting Pathway

When a child protection concern arises:

1. LISTEN

Take the child or person seriously. Do not investigate.

2. PROTECT

Consider whether anyone is in immediate danger. Call 000 where necessary.

3. RECORD

Write down what was said, observed and done.

4. REPORT INTERNALLY

Notify the Director or designated child-safety contact as soon as practicable.

5. REPORT EXTERNALLY

Consider Police, the Department of Communities and Justice, the Office of the Children's Guardian and any individual mandatory reporting obligations.

6. MANAGE RISK

Take reasonable steps to protect the child and other children.

7. DOCUMENT

Keep clear records of reports, decisions and actions.

28. Review

This procedure will be reviewed at least every two years and earlier where:

- NSW child-protection legislation changes;
- regulatory guidance changes;
- ANW becomes subject to additional reporting requirements;
- a significant child-safety incident identifies a gap in the procedure;
- ANW's programs materially change; or
- the Board determines that an earlier review is required.

Significant amendments must be approved by the ANW Board.