# CHILD SAFETY AND WELLBEING

**POLICY AND PROCEDURES**

**Ballarat Centre of Music & the Arts (BCMA)**
OSTOHAJI Pty Ltd ITF Heenan Waters Family Trust

## IMMEDIATE DANGER OR LIFE-THREATENING EMERGENCY: CALL 000

| Document control | Details |
|---|---|
| Document owner | BCMA Management |
| Approved by | Company Director – Paula Heenan |
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| Applies to | Management, staff, contractors and volunteers; relevant expectations also apply to students, families and visitors |
| Related documents | Code of Conduct; Confidentiality and Intellectual Property Agreement; Complaint Handling Policy; Recruitment and Screening Policy; Risk Assessment and Management Plan; Volunteer Agreement; Independent Contractor Agreement; Training and incident records |

## 1. BACKGROUND AND COMMITMENT

The Ballarat Centre of Music & the Arts (BCMA) is a performing arts tuition and performance centre and talent management agency based in Ballarat, Victoria. BCMA provides music, dance, drama, musical theatre, performance, production and related activities.

Every child has the right to feel safe, respected, accepted and welcome. The safety, wellbeing and best interests of children are central to BCMA's decisions, programs, teaching, productions, recruitment and everyday operations.

BCMA has a zero-tolerance approach to child abuse, grooming, exploitation, neglect, violence, bullying, racism and other conduct that places a child at risk of harm. BCMA is committed to preventing harm, responding promptly to concerns, listening to children and taking appropriate action.

## 2. PURPOSE, SCOPE AND APPLICATION

This Policy explains BCMA's commitment to child safety and wellbeing and the practical steps taken to prevent, identify and respond to child abuse and harm. It applies whenever BCMA engages with children or delivers services, classes, private lessons, rehearsals, auditions, performances, events, agency activities or other child-related work.

It applies to:

- Company Director and all members of BCMA Management;
- employees and office staff, including administration and cleaning staff;
- contractors, including teachers, costume personnel, gardeners and other service providers;
- volunteers, including Artistic Support Coordinators (ASC), parent helpers and other adult volunteers;
- third-party contractors and venue/service providers, where relevant.

This Policy is read together with the BCMA Code of Conduct and supporting documents. Applicable law and lawful directions from authorities take precedence. Management will obtain advice where the correct application is unclear.

## 3. GOVERNANCE AND KEY CONTACTS

| Role | Person / responsibility |
|---|---|
| Company Director | Paula Heenan – overall governance and accountability |
| Business and Marketing Manager | Emma Sbardella – delegated management and child-safety responsibilities |
| Child Safety officers / child-facing contacts | Paula Heenan and Emma Sbardella. Children may also approach a trusted teacher or front-office staff. ASC Managers |

A concern about a member of Management must not be managed solely by the person who is the subject of the concern. BCMA will arrange an independent contact, external adviser or appropriate authority as required.

## 4. DEFINITIONS

| Term | Meaning |
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| BCMA | Ballarat Centre of Music & the Arts, the trading name of OSTOHAJI Pty Ltd ITF Heenan Waters Family Trust. |

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| Management | Paula Heenan, Emma Sbardella and Office Management |
| Contractors | Teachers, costume personnel, gardeners and other people or businesses contracted to provide services. |
| Staff | Office administrators, cleaners and other people employed by BCMA. |
| Volunteers | ASC (Artistic Support Coordinators), parent and other adult helpers, and others volunteering services. |
| Child / children | A person under 18 years of age. |
| Child abuse | Includes sexual abuse or exploitation, grooming, physical violence, serious emotional or psychological harm and serious neglect. It may be perpetrated by an adult or another child. |
| Harm | Damage or risk of damage to a child's physical, psychological, emotional or developmental health, safety or wellbeing. Harm may arise from one event or a pattern. |
| Child safety concern | Any information, observation, behaviour, disclosure, incident or circumstance that may indicate a child is unsafe or at risk. |
| Disclosure | Information shared by a child or another person indicating abuse, harm or a safety concern may have occurred or may be occurring. |
| Complaint | An expression of dissatisfaction about BCMA services, a person's conduct, a disclosure, handling of a prior concern or the safety of a child, group, activity or environment. |
| Incident / near miss | An event that caused or could have caused harm / an event that did not cause harm but had the potential to do so. |
| WWCC | Working with Children Check under Victorian law. |

## 5. SUPPORTING DOCUMENTS AND SYSTEM

The following documents and systems work together with this Policy:

- BCMA Code of Conduct;
- BCMA Confidentiality and Intellectual Property Agreement;
- Complaint Handling Policy and procedures;
- Recruitment and Screening Policy and role descriptions;
- Risk Assessment and Management Plan, including physical and online environments;
- Volunteer Agreement and Independent Contractor Agreement;
- Child-safety induction and training materials and Training Register;
- WWCC and WWC Connect records;
- Child Safety Incident Report Form and Incident Report Register;
- Complaint and investigation records;
- Medical, injury, emergency and near-miss reporting procedures;
- Production, backstage, photography, social media, excursion and event procedures.

The Confidentiality and Intellectual Property Agreement supports privacy and information protection. It does not prevent anyone from reporting a child-safety concern, making a lawful disclosure or cooperating with an authority.

## 6. THE 11 VICTORIAN CHILD SAFE STANDARDS

| Standard | Expected outcome |
|---|---|
| 1 | Culturally safe environments in which the diverse and unique identities and experiences of Aboriginal children and young people are respected and valued. |
| 2 | Child safety and wellbeing is embedded in organisational leadership, governance and culture. |
| 3 | Children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously. |
| 4 | Families and communities are informed and involved in promoting |

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| | child safety and wellbeing. |
| 5 | Equity is upheld and diverse needs are respected in policy and practice. |
| 6 | People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice. |
| 7 | Processes for complaints and concerns are child focused. |
| 8 | Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training. |
| 9 | Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed. |
| 10 | Implementation of the Child Safe Standards is regularly reviewed and improved. |
| 11 | Policies and procedures document how the organisation is safe for children and young people. |

## STANDARD 1 – CULTURAL SAFETY FOR ABORIGINAL CHILDREN

BCMA recognises the Wadawurrung and Dja Dja Wurrung Peoples as Traditional Custodians of the lands on which BCMA lives and works. BCMA pays respect to Elders past and present and acknowledges Aboriginal and Torres Strait Islander peoples and communities across Australia.

BCMA is committed to a culturally safe environment where Aboriginal children and families are welcomed, respected and supported to express their identity, culture, beliefs and connection to community. BCMA recognises that family and kinship relationships may be understood and expressed in different ways.

- Support children to express their culture and enjoy their cultural rights without pressure to explain or represent their identity.
- Consult Aboriginal children and families, and relevant Aboriginal organisations where appropriate, about culturally safe programs and environments.
- Use culturally respectful material and, where appropriate, include Aboriginal and Torres Strait Islander perspectives in music, dance, drama, choreography, productions and learning resources.
- Acknowledge Country at performances and events in a respectful and contextually appropriate way. Where a Welcome to Country is appropriate, engage an authorised Traditional Owner representative.
- Provide staff, contractors and volunteers with opportunities and information to build cultural awareness.
- Recognise culturally significant dates where appropriate.
- Identify, challenge and respond to racism, stereotyping, exclusion and culturally unsafe conduct. Racist conduct is not dismissed as a joke or harmless teasing.
- Invite feedback from children and families about whether they feel safe expressing their culture and identity.

Racism may include racial slurs, verbal abuse, intimidation, online abuse, exclusion, discriminatory treatment or physical abuse connected to race or culture. Concerns are reported to Management. If Management is involved, the matter is referred externally.

## STANDARD 2 – LEADERSHIP, GOVERNANCE AND CULTURE

Child safety is a shared responsibility and a core part of BCMA's leadership, decision-making and culture. Management is responsible for resourcing, implementing and monitoring this Policy. Every person engaged by BCMA is responsible for acting consistently with it.

- Management models respectful, child-safe behaviour and responds promptly to concerns.
- BCMA communicates its commitment through enrolment information, recruitment advertising, policies, posters, website and communications.
- The Code of Conduct is provided on commencement and reviewed at least annually and when changes are made. Relevant personnel acknowledge it.
- Management assigns responsibility for screening, induction, training, risk assessment, complaints, records and review.
- Child safety is considered when planning classes, private lessons, productions, auditions, backstage operations, costumes, photography, excursions, events and agency work.
- BCMA promotes a culture in which concerns can be raised without intimidation, retaliation or disadvantage.
- Risks are documented, reviewed and addressed. Corrective actions are assigned and monitored.
- For third parties, Management assesses child-safety risks and sets conditions for access, supervision, screening and compliance.

Management must determine and document whether BCMA is a covered entity under Victoria's Reportable Conduct Scheme. If it applies, BCMA will comply with relevant notification, investigation, oversight and reporting requirements. This Policy does not assume every incident automatically falls within that scheme.

## STANDARD 3 – CHILDREN'S RIGHTS, PARTICIPATION AND VOICE

Children have the right to be listened to, treated with dignity, express their views, make age-appropriate choices and raise concerns without fear.

- Explain to children, in age-appropriate language, that they have the right to feel safe and can speak to a teacher, Child Safety Hero or front-office staff member.
- Tell children they will be listened to and that adults may need to share information to help keep them or another child safe.
- Provide more than one way to raise concerns, including speaking to a trusted teacher, Paula Heenan, Emma Sbardella or another suitable adult.
- Seek children's views, where appropriate, about decisions affecting participation, safety, access, costumes, performances, rehearsals and learning.
- Take concerns seriously and provide feedback about outcomes to the extent appropriate and lawful.
- Do not punish, shame, ridicule or disadvantage a child for raising a concern.
- Provide information in a way children can understand, considering age, disability, communication needs, culture and language.
- Respect a child's right to decline physical contact or request an alternative where reasonably possible.

## STANDARD 4 – FAMILY AND COMMUNITY INVOLVEMENT

BCMA values families and communities as partners in child safety. Families should understand BCMA's approach, know how to raise concerns and contribute to decisions affecting their child.

- Make this Policy, the Code of Conduct and complaint information accessible to families.
- Provide clear information about programs, supervision, relevant risks, event arrangements and child-safety practices.
- Invite families to provide information about a child's needs, access requirements, communication preferences and relevant safety considerations.
- Offer different communication methods where written communication is not suitable, including phone or in-person discussion.
- Invite feedback on policies and practices and consider it in reviews.
- Explain that information may be shared with authorities or others where required or authorised to protect a child or comply with law.
- Ensure family involvement does not override a child's safety, rights, privacy or best interests.

## STANDARD 5 – EQUITY AND RESPECT FOR DIVERSE NEEDS

Every child should have a fair opportunity to participate in BCMA programs and access support and complaint processes. BCMA recognises different abilities, identities, family circumstances, cultures, languages and beliefs.

- Respect children regardless of disability, race, ethnicity, culture, language, sex, gender identity, sexual orientation, religion, family structure, socioeconomic circumstances or living arrangements.
- Pay particular attention to children with disability; Aboriginal children; children from culturally and linguistically diverse backgrounds; children in out-of-home or kinship care; LGBTIQA+ children; and children experiencing vulnerability or disadvantage.
- Ask families and children what reasonable supports or adjustments may assist participation rather than making assumptions.
- Provide accessible information and complaint pathways, including alternative communication and support people where appropriate.
- Respond to discriminatory conduct, bullying, harassment, exclusion or victimisation.
- Consider accessibility and inclusion in class allocation, facilities, costumes, changing areas, performances, online activities and emergency arrangements.
- Protect a child's privacy; do not disclose identity, disability, health or family information unless authorised or necessary for a lawful child-safety purpose.

## STANDARD 6 – SUITABILITY, RECRUITMENT AND SUPPORT

BCMA takes reasonable steps to engage suitable people, screen and verify them, provide clear expectations and supervise their conduct. A WWCC is one part of screening and does not replace reference checks, identity checks, role assessment, induction or ongoing supervision.

### Recruitment and screening procedures

- Assess child-safety responsibilities and risks of each role before recruitment or engagement.

- Use child-safe recruitment advertising and role descriptions.
- Conduct values-based interviews about experience, boundaries, responding to disclosures and child-safe practice.
- Verify identity, references, qualifications, registrations and professional memberships where relevant.
- Obtain and verify a current Victorian WWCC for roles where BCMA requires it, including where BCMA policy requires a check even if a statutory exemption may apply. Verify VIT registration where relevant.
- Record screening outcomes and risk-management decisions securely.
- Do not allow child-related duties to commence until required checks and approvals are complete, unless a lawful and documented exception applies.
- Re-check status and expiry dates, respond to changes, and remove or restrict child-related duties where required.
- Assess any proposed subcontractor or substitute before attendance or service delivery. Prior written BCMA approval is required under the relevant contractor arrangement.
- Maintain supervision, feedback and performance management. A current WWCC does not remove the need to respond to concerning conduct.

### WWCC Connect – Victorian requirements effective 19 October 2026

BCMA maintains its WWCC compliance process in line with Victorian reforms effective 19 October 2026. The nominated BCMA user will use WWC Connect to connect relevant workers and volunteers to the organisation and keep required details current. This includes notifications when a person starts or stops child-related work and when relevant details change, as required by the system and law.

Mandatory online child-safety training forms part of the WWCC application and renewal process for new applicants, people renewing a clearance and people changing from a volunteer clearance to an employee clearance. A person with a current clearance does not need to repeat this training solely because the reforms commenced; they complete it when the relevant trigger applies. BCMA will communicate requirements and retain evidence as appropriate.

### Induction

Before commencing duties, each employee, contractor and volunteer receives role-appropriate induction covering:

- this Policy;
- BCMA Code of Conduct;
- Confidentiality and Intellectual Property Agreement;
- complaint handling and reporting pathways;
- recognising abuse, harm, grooming and boundary breaches;
- responding to disclosures and recording concerns;
- privacy, confidentiality and lawful information sharing;
- physical and online safety, consent-to-touch and supervision;
- role-specific risks including private lessons, backstage, costume areas, events and productions;
- WWCC / WWC Connect and training obligations relevant to the person.

## STANDARD 7 – CHILD-FOCUSED COMPLAINTS AND CONCERNS

BCMA welcomes concerns and complaints and treats reports of child abuse, harm, unsafe conduct or policy breaches seriously. The child's safety, wellbeing, dignity and best interests guide the response. A child does not need to use the word "complaint" or provide proof for a concern to be taken seriously.

| Who | How to contact BCMA |
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| Children | Speak to their teacher, another trusted adult, Paula Heenan, Emma Sbardella or front-office staff. |
| Families, staff, contractors, volunteers or community | Phone 03 5331 3086 or 0422 247 660, or email paula@bcma.com.au. A meeting can be arranged where appropriate. |
| Urgent safety concern | Do not wait for an appointment or email response. Take immediate protective action and contact emergency services or the appropriate authority. |

A concern about Paula Heenan or another member of Management must be directed to an alternative senior contact or external authority. A person may report directly to Police, Child Protection or another relevant authority; internal reporting is not a prerequisite.

### Responding when a child discloses harm

1. Stay calm, listen carefully and give the child time to speak.
2. Take the child seriously. Reassure them they did the right thing by telling you and that the harm is not their fault.
3. Use open, minimal prompts only if needed. Do not ask leading, repeated or investigative questions.
4. Do not promise secrecy. Explain that you may need to tell people whose job it is to help keep them safe.
5. Do not express shock, disbelief, blame or anger toward the child or alleged person.
6. Do not investigate, confront the alleged person or seek evidence yourself.
7. Ask only what is necessary to understand immediate safety needs. Avoid asking the child to repeat the account to multiple people.
8. Check whether the child is safe now and whether they are worried about leaving the venue or going home.
9. Report promptly to Management or the appropriate authority. If Management is implicated, use an independent route.
10. Write a factual record as soon as possible, using the child's words as accurately as possible and distinguishing observations from information reported by others.

### Immediate response and reporting

| Situation | Response |
|---|---|
| Immediate danger, serious injury or life-threatening emergency | Call 000. Take reasonable steps to keep the child safe. Notify Management when safe. |
| Disclosure or reasonable concern about abuse or harm | Listen, support, record and report promptly to Management and/or the appropriate external authority. Do not wait for internal approval if a report is legally required or urgent. |
| Suspected sexual offence by an adult against a child under 16 in Victoria | Adults may have a legal duty to disclose information to Victoria Police unless a lawful exception applies. Report promptly. Do not investigate. |
| Concern meeting mandatory reporting criteria | A person who is a mandatory reporter must report to Child Protection as soon as practicable. Internal notification does not replace the individual legal duty. |
| Immediate child-protection concern after hours | Contact Child Protection After Hours on 13 12 78 where appropriate; call 000 for immediate danger. |

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| Possible criminal conduct or risk posed by an adult | Contact Victoria Police. Seek specialist advice where relevant. |
| Non-immediate wellbeing concern | Discuss with Management and consider referral to The Orange Door or another service, provided this does not delay or replace a required report. |

Mandatory reporting duties apply to specified professional groups and circumstances, not automatically to every BCMA worker. Some BCMA teachers may be registered teachers or fall within another mandatory reporter category. Each person remains responsible for their own legal duties. BCMA's internal policy requires all personnel to report child-safety concerns to Management or an appropriate authority, even if they are not mandatory reporters.

### Management response to complaints

- Acknowledge receipt as soon as practicable. The existing BCMA procedure targets written acknowledgement within 36 hours where appropriate; this target must not delay urgent action.
- Assess immediate and ongoing risks and implement protective measures.
- Determine whether Police, Child Protection, the Social Services Regulator, a Reportable Conduct Scheme regulator or another authority must be notified.
- Preserve relevant evidence, records, messages, footage and other material. Do not alter or destroy records.
- Appoint an impartial person to manage the complaint. Where Management is involved, use an independent external person or authority.
- Provide procedural fairness to people who are the subject of allegations without compromising child safety, evidence or an external investigation.
- Keep relevant people informed to the extent appropriate and lawful.
- Document decisions, reasons, actions, referrals, notifications and outcomes.
- Provide support to the child and family where appropriate, including referral to qualified services. BCMA personnel do not provide counselling beyond their qualifications.
- Review whether the incident reveals a systemic issue, training gap or risk requiring corrective action.

The former policy specified informing other parties within 48 hours. This is not an inflexible deadline: timing and content of notifications must be decided case by case, considering child safety, Police or Child Protection advice, privacy, procedural fairness and legal restrictions.

### Confidentiality and information sharing

BCMA handles complaints and child-safety records sensitively and shares information only where authorised or required. Confidentiality is not absolute. It must not prevent a report, suppress a concern, obstruct an investigation or place a child at risk. Relevant information may need to be shared with Management, Police, Child Protection, regulators, insurers, legal advisers or other authorised services to protect a child, respond to a complaint or comply with law.

## STANDARD 8 – TRAINING AND AWARENESS

BCMA provides induction and ongoing child-safety education to Management, staff, contractors and volunteers. Training is provided at commencement, reviewed at least annually and refreshed when risks, law, procedures or roles change.

- the 11 Child Safe Standards and BCMA policies;
- Aboriginal cultural safety, cultural awareness and anti-racism;
- recognising physical, sexual, emotional and psychological abuse, neglect, grooming, exploitation, bullying and changes in behaviour;
- responding to disclosures and supporting children;
- internal and external reporting pathways and individual legal obligations;
- complaint handling, privacy, information sharing and secure record keeping;
- professional boundaries, consent-to-touch, supervision and safe physical contact;
- online safety, cyberbullying, image sharing and digital communications;
- risk identification and management in studios, private lessons, productions and events;
- emergency response, first aid arrangements and incident reporting;
- WWCC Connect and mandatory WWCC training requirements where applicable.

BCMA maintains a Training Register recording the person, role, training completed, date, provider and any refresher due.

## STANDARD 9 – PHYSICAL AND ONLINE ENVIRONMENTS

BCMA assesses and manages risks in all physical and online environments connected with its activities. Risk management must be practical and proportionate and must protect children without unnecessarily restricting privacy, learning, participation or social connection.

### Studios, classrooms and private lessons

- Rooms should remain observable wherever reasonably practicable. Windows and glass panels support visibility; doors and coverings must not create hidden or isolated situations.
- One-to-one contact must not occur in a concealed or isolated space. Private lessons take place in an approved observable room with appropriate visibility and access arrangements.
- A teacher or adult must not transport a child alone unless an approved, documented arrangement and safeguards are in place.
- Follow attendance, arrival and collection procedures. Release children only to a parent, guardian or authorised collector in accordance with BCMA records and instructions.
- Clarify who supervises children during transitions, breaks, toilet visits, rehearsals and collection.
- Children must not be left unsupervised in studios, corridors, dressing rooms, backstage areas or other BCMA-controlled spaces.

### Consent to touch and physical instruction

- Seek the child's consent before touching them, including correcting alignment, positioning limbs, assisting a stretch, adjusting a costume or providing physical assistance.
- Explain the proposed contact and why, in age-appropriate language. Respect refusal or discomfort and use verbal instruction or demonstration where possible.
- Physical contact must be necessary, proportionate, respectful and limited to the task. Never use force to stretch or move a child beyond comfortable limits.
- For young children or children unable to provide informed verbal consent, follow BCMA procedures, consider parent/carer guidance and use the least intrusive safe assistance.

- Costume adjustments and changing assistance must respect privacy, consent, age, dignity and supervision requirements.

### Toileting, changing rooms and dressing rooms

- A parent/carer should assist a young child with toileting wherever reasonably possible.
- Where BCMA adult assistance is necessary, alert another responsible adult, follow the child's known needs and maintain appropriate visibility and privacy. Remain outside a cubicle unless assistance is necessary for safety or care.
- Adults must not be alone in a closed dressing room or changing area with a child. Maintain appropriate supervision and privacy.
- Children must have age-appropriate privacy when changing. Never photograph or record in toilets, changing rooms or dressing areas.
- Communicate production-specific dressing room plans, quick-change procedures and ASC supervision arrangements before rehearsals and performances.

### Productions, rehearsals, performances and events

- Complete and review risk assessments for rehearsals, dress rehearsals, performances, auditions, backstage, front of house, transport, venue access and emergency evacuation.
- Assign clear supervision responsibilities for check-in/check-out, dressing rooms, backstage, quick changes, first aid and front of house.
- Maintain accurate attendance and child-location information, particularly during transitions and at external venues.
- Ensure children know which adults are responsible for them and how to seek help.
- Manage backstage access and restrict access to authorised people. Supervise visitors and contractors where appropriate.
- Plan safe arrival, collection, late collection and lost-child responses. Do not leave a child alone while resolving collection issues.
- Assess costumes, props, scenery, rigging, cables, tools, chemicals and manual handling activities.
- Follow venue emergency procedures and BCMA risk assessments.

### Photography, video and social media

- Follow current parent/guardian permissions and BCMA photography records for each student. Check permission before capturing or publishing identifiable images.
- No staff member, contractor or volunteer may independently photograph, film or record a child using a personal device unless expressly authorised for a specific BCMA purpose and in accordance with BCMA procedures.
- Do not publish or share images of a child on personal social media or personal accounts. Use approved BCMA accounts, devices and processes only.
- Do not take images in toilets, changing rooms, dressing rooms or other private spaces.
- Do not identify a child's location, schedule, personal details or sensitive information in a post.
- Respect refusal, restriction or withdrawal of consent and promptly stop using material where required and practicable.
- Store images and recordings securely, limit access and use them only for the approved purpose.

### Online communications and digital safety

- Use BCMA-approved channels for communications with children and families. Include parents/carers or another appropriate adult where practicable and consistent with the purpose.
- Do not initiate private, secretive or inappropriate direct messages with a child. Do not use disappearing messages or personal accounts to avoid oversight.
- Keep communications professional, relevant to BCMA activities and within reasonable hours, except urgent operational matters.
- Do not request or share intimate images, sexualised content, passwords or unnecessary personal information from a child.
- Report cyberbullying, grooming, harassment, inappropriate contact, image-based abuse or concerning online behaviour promptly.
- For online lessons or activities, use approved platforms, appropriate adult oversight and secure access settings.

### Third-party contractors and external venues

- Assess whether venue staff, photographers, production personnel, suppliers or other third parties may contact children or access child information.
- Where practicable, arrange maintenance and contractor work when children are not present. If attendance is unavoidable, restrict access and supervise.
- Require relevant screening, WWCC and policy compliance where appropriate to the role and law.
- Do not permit subcontracting or assignment of child-related services without prior written BCMA approval and completion of relevant checks.
- If BCMA cannot adequately manage the risk, change the arrangement, restrict access or terminate the engagement as appropriate.

## STANDARD 10 – REVIEW AND CONTINUOUS IMPROVEMENT

BCMA reviews child-safety practices at least each January and whenever a significant incident, near miss, complaint, legislative change, activity change or identified risk indicates an earlier review is needed.

- complaints, concerns, incidents and near misses, including patterns and recurring risks;
- whether policies and procedures were understood and followed;
- whether supervision, recruitment, training and risk controls were effective;
- feedback from children, families, staff, contractors and volunteers;
- changes to programs, premises, technology, productions and external venues;
- changes to legislation, regulatory guidance and government systems;
- actions required, the person responsible and completion date.

Management records review findings and communicates relevant changes to affected people. Lessons are shared without unnecessarily identifying children or other individuals.

## STANDARD 11 – POLICIES, PROCEDURES AND DOCUMENT CONTROL

This Policy is written to be accessible and operational. Management ensures relevant people receive the current version, understand their responsibilities and have access to associated forms and procedures. The Policy is reviewed at least annually in January and following significant changes. Superseded versions

are archived securely. Changes are communicated and updated acknowledgements or training are obtained where appropriate.

# 7. REPORTING AND RECORD-KEEPING PROCEDURE

### What must be recorded

- date, time and location of the event or disclosure;
- date and time the record was made and by whom;
- the child's name and relevant identifying details, stored securely;
- names and roles of people involved and witnesses, where known;
- what was seen, heard or disclosed, using exact words where possible;
- observable facts, clearly distinguished from opinions or information provided by others;
- immediate safety actions and risk controls;
- who was notified, when, how and what advice was received;
- external reports, reference numbers and follow-up actions;
- evidence preserved and where it is held;
- decisions, reasons, outcomes and review actions.

Do not speculate, diagnose, exaggerate, make assumptions or include irrelevant personal commentary. Do not amend an original record in a way that obscures the original. Corrections or additions should be dated and attributed.

## Compliance to Mandatory Reporting and/or The Reportable Conduct Scheme

In Victoria, dance schools are not automatically subject to mandatory reporting duties simply because they teach children. However, there are important child-safety reporting obligations that apply to dance schools, their directors and people working with children.

**1. Mandatory reporting: which contractors, volunteers, staff are covered?**

Under Victoria's Children, Youth and Families Act 2005, the prescribed mandatory reporters include registered teachers, early childhood teachers, doctors, nurses, police and certain other professionals.

This means:

- A dance/drama/music teacher who is also a registered teacher is a mandatory reporter.
- A dance teacher who is not a registered teacher is not automatically a mandatory reporter just because they teach children.
- The same applies to other BCMA personnel: their reporting status depends on whether they fall within one of the legally prescribed professional groups.

A mandatory reporter who forms a reasonable belief, through their work, that a child needs protection from physical injury or sexual abuse must report to Child Protection as soon as practicable. They do not need to investigate or prove that abuse has occurred.

The key distinction is: not every dance teacher is a mandatory reporter, but every person working with children at BCMA has child-safety responsibilities and should be required to report concerns.

**2. Reportable Conduct Scheme: which contractors, volunteers, staff are covered?**

"Victoria's Reportable Conduct Scheme applies to organisations that exercise care, supervision or authority over children, as part of their primary functions or otherwise."

However, whilst the Victorian Government website provides a list of organisations and service types covered by the Scheme, dance schools and performing arts tuition centres are not specifically listed, nor do they fall within any of the government department or service categories identified.

**3. Other reporting obligations apply to everyone**

Even if a person is not a Mandatory Reporter or covered by the Reportable Conduct Scheme, two important Victorian criminal offences can apply:

- Failure to disclose: All adults are required to report to Victoria Police if they form a reasonable belief that another adult has committed a sexual offence against a child under 16.
- Failure to protect: A person in a position of authority within an organisation may commit an offence if they know of a substantial risk of a sexual offence against a child under 16 by an adult associated with the organisation and fail to take reasonable steps to reduce or remove that risk.

These obligations are particularly important for directors, managers and people supervising children.

**3. What applies to BCMA as an organisation?**

BCMA's obligations are broader than mandatory or reportable conduct reporting. Victorian Child Safe Standards apply to organisations providing services specifically for children, including relevant cultural, sport and recreation services and certain entertainment services. The Standards require organisations to have clear internal and external reporting processes, child-focused complaint handling, appropriate staff induction and risk-management procedures.

For BCMA, that means all teachers, staff, contractors and volunteers are required by BCMA policy to report child-safety concerns internally to management, even if they are not legally classified as mandatory reporters.

## Child Safety Records Management, Storage and Retention

BCMA is committed to maintaining accurate, complete and secure records relating to child safety and wellbeing.

All records relating to child safety concerns, complaints, disclosures, allegations, incidents, investigations and actions taken by BCMA must be documented as soon as practicable and maintained in a secure and confidential manner.

### Storage and Security

Child safety records must:

- Be stored separately from general student administration records wherever practicable.
- Be maintained in a secure, access-controlled digital or physical storage system.
- Only be accessible to the Director and other specifically authorised personnel who require access to fulfil their responsibilities.
- Be protected against unauthorised access, alteration, loss, damage or disclosure.
- Be backed up and maintained in a format that allows records to remain accessible over extended periods.

Staff, contractors and volunteers must not retain confidential child safety records on personal devices, personal email accounts or other unauthorised storage systems.

**Record Retention**

BCMA adopts the Royal Commission into Institutional Responses to Child Sexual Abuse's recommendation that records relating to child sexual abuse that has occurred or is alleged to have occurred be retained for a minimum of 45 years from the date of the incident.

Records relating to child safety and wellbeing will be retained in accordance with applicable legislation, regulatory requirements, relevant limitation periods and BCMA's records retention schedule.

Records must not be destroyed where an investigation, complaint, allegation, legal proceeding or other matter remains unresolved or where there is a reasonable likelihood that the records may be required as evidence in future proceedings.

**Responsibility and Disposal**

The Director is responsible for overseeing the secure management, retention and appropriate disposal of child safety records.

A Child Safety Records Retention Register will be maintained to identify relevant records, their storage locations, applicable retention periods and authorised disposal dates.

No child safety incident, allegation, disclosure or investigation record may be destroyed without the Director's review and written approval.

Where BCMA ceases operating or undergoes a change in ownership, arrangements must be made to ensure the continued secure preservation, confidentiality and accessibility of records in accordance with applicable legal requirements.

## 8. NON-COMPLIANCE AND PROTECTIVE ACTION

A suspected breach of this Policy, the Code of Conduct or another child-safety requirement will be assessed promptly. Interim measures may include increased supervision, changes to duties, restriction of access, removal from child-related work, suspension or termination of engagement, subject to applicable law and contractual or employment obligations.

Protective action is not a finding that an allegation is proven. BCMA balances child safety, procedural fairness, privacy and any direction from Police, Child Protection or a regulator.

## 9. CHILD EMPLOYMENT IN ENTERTAINMENT

BCMA engages children in performances and other entertainment-related activities. Where BCMA employs a child under 15 in entertainment, it must hold the required entertainment-specific child employment license and comply with the Child Employment Act 2003 (Vic), the Mandatory Code of Practice for the Employment of Children in Entertainment, license conditions and other applicable requirements.

Management verifies the current license status, nominated employer representative, child notifications, parental consent, supervision, hours, breaks, tutoring and record-keeping requirements before each relevant engagement. A license is not assumed to remain current from one year to the next.

BCMA holds a current Child Employment License: Code **CEL-26-2194 Expiry date 28/01/2027 Status Valid**

## 10. KEY EXTERNAL CONTACTS

| Service | Purpose | Contact |
|---|---|---|
| Emergency services | Immediate danger or life-threatening emergency | 000 |
| Victoria Police | Criminal conduct and police matters | 000 emergency; 131 444 non-urgent |
| Child Protection – West Division intake | Child protection reports for relevant regional areas; confirm correct intake | 1300 360 462 |
| Child Protection After Hours | Urgent child-protection concerns after hours | 13 12 78 |
| Kids Helpline | Support for children and young people | 1800 55 1800 |
| 1800RESPECT | Sexual assault, domestic and family violence support | 1800 737 732 |
| Lifeline | Crisis support | 13 11 14 |
| The Orange Door | Family violence and child/family wellbeing referrals | 1800 219 819 |
| Social Services Regulator | Child Safe Standards and Reportable Conduct Scheme | 1300 310 778 |
| Workforce Inspectorate Victoria | Child employment licensing and entertainment requirements | 1800 287 287 |

Verify contact details, service names, jurisdiction and opening hours immediately before publication and at least annually. Do not delay an emergency response while searching for a number.

## 11. BCMA CHILD-SAFE PRACTICE RULES – QUICK REFERENCE

- Put the child's safety and wellbeing first.
- Maintain professional boundaries at all times.
- Never use physical punishment, humiliating language, threats, grooming behaviour or sexualised conduct.
- Seek and respect consent before physical contact; use verbal instruction or demonstration where possible.
- Do not be alone with a child in an isolated or concealed space.
- Follow private lesson, toileting, changing-room, backstage and collection procedures.
- Use approved BCMA communication channels; no secretive or inappropriate contact.

- Follow photography and social media permissions; no personal posting of children.
- Report concerns, disclosures, incidents and near misses promptly.
- Do not investigate, confront an alleged perpetrator or promise secrecy.
- Keep accurate records and protect confidential information.
- Confidentiality never overrides child safety or lawful reporting.

## APPENDIX A – RESPONSE TO A CHILD DISCLOSURE

| DO | DO NOT |
|---|---|
| Listen calmly and give the child time. | Do not interrogate or ask leading questions. |
| Reassure the child they did the right thing by telling you. | Do not promise to keep it secret. |
| Use the child's own words in your notes. | Do not reinterpret, embellish or diagnose. |
| Check immediate safety and seek emergency help if needed. | Do not confront the alleged person. |
| Report promptly to Management and/or authorities. | Do not investigate or wait for internal permission to make a required report. |
| Keep information secure and share only with those who need to know. | Do not discuss the matter with unauthorised people. |

## APPENDIX B – INCIDENT / CONCERN RECORD CHECKLIST

- Name and contact details of person completing the report.
- Child's name and relevant details (store securely).
- Date, time and location of incident, concern or disclosure.
- Date and time the record was made.
- Names of people involved and witnesses, if known.
- Factual description of what happened or was said; exact words where possible.
- Immediate safety actions and medical/emergency response.
- Who was notified, when and by what method.
- External authority contacted, advice received and reference number, if any.
- Evidence preserved and where held.
- Follow-up actions, responsible person and due date.
- Name and signature of person completing the record.

Submit the completed BCMA Child Safety Incident Report Form through the current approved secure process. The former policy identifies paula@bcma.com.au as the submission email. Management must confirm whether this remains the approved secure channel or replace it with the current restricted-access system before issue.

## APPENDIX C – CHILD-FRIENDLY COMPLAINT INFORMATION

At BCMA, you have the right to feel safe, welcome and respected.

If something makes you feel unsafe, uncomfortable or worried, you can:

- tell your teacher;
- talk to Paula or Emma (our Child Safety officers);
- speak to another adult at the front office;
- ask a parent, carer or trusted adult to help you speak to us.

You are not in trouble for speaking up. We will listen and take you seriously. We cannot promise to keep everything secret, because sometimes we need to tell people who can help keep you safe.

## APPENDIX D – STAFF, CONTRACTOR AND VOLUNTEER ACKNOWLEDGEMENT

I acknowledge that I have received, read and understood the BCMA Child Safety and Wellbeing Policy and Procedures. I understand that I am responsible for following the requirements relevant to my role, completing required induction and training, maintaining professional boundaries, and promptly reporting child-safety concerns, disclosures, incidents and breaches.

I understand that confidentiality does not prevent or restrict appropriate child-safety reporting, lawful disclosure or cooperation with authorities.

I understand that a breach of this Policy may result in corrective action, changes to duties, suspension or termination of my engagement, subject to applicable law and my employment, contract or volunteer arrangements.

Full name: _____

Role / position: _____

Signature: _____

Date: _____

BCMA representative: _____

Signature: _____

Date: _____

## APPENDIX E – MANAGEMENT APPROVAL OF DOCUMENT

Approved by: Paula Heenan

Position: Company Director_

Signature: _____

Approval date: 10.11.2026

Next review date: January 2028