

Child Safe Environments Policy



Purpose

This policy was written to demonstrate the strong commitment to child safety at Torrens Connect.

Torrens Connect has established and is maintaining a child safe and child friendly environment for children and young people who use our services.

Scope

This policy applies to all employees and subcontractors whilst performing work with Torrens Connect.

All employees and contractors are required to agree in writing to accept and act in accordance with the policy.

Definitions

The following definitions apply to this policy:

Child or young person - persons under 18 years of age.

Harm - Section 17 of the *Children and Young People (Safety) Act 2017* defines 'harm' to mean physical or psychological harm (whether caused by an act or omission), including harm caused by sexual, physical, mental or emotional abuse or neglect.

Working with Children Check (WWCC) - People working or volunteering with children in South Australia must, by law, have a valid, not prohibited Working with Children Check. A Working with Children Check is an assessment of whether a person poses an unacceptable risk to children. As part of the process, the Screening Unit will look at criminal history, child protection information and other information.

Commitment

Torrens Connect is committed to ensuring a safe and comfortable public transport experience for all children and young people. We uphold the values of inclusivity and respect, welcoming individuals regardless of their abilities, gender, or socio-cultural background. Our commitment to diversity and acceptance extends to people from all walks of life.

We firmly believe that every child and young person deserves a secure journey on public transport, and therefore, no child or young person will be denied travel unless unable travel under advice from SA Police.

At Torrens Connect, we prioritise the safety and wellbeing of all children and young people. We foster a child safe culture at every level of our organisation, championing respect and support for young passengers.

We maintain a zero-tolerance stance against any form of harm or potential risk of harm to children and young people. Allegations or safety concerns are handled with utmost seriousness and consistency,

Child Safe Environments Policy



adhering strictly to our established policies and procedures. We recognise both legal and moral obligations to promptly involve authorities whenever a child's safety is compromised.

Our Staff

Torrens Connect Tram Operations and Customer Service staff are accredited to provide public transport services. Gaining this accreditation includes obtaining a National Criminal History Check and a Working with Children Check (WWCC).

Prior to driving in service (carrying passengers) all Trainee Tram Operators attend an induction course which includes instructions on providing public transport services to children and young people.

To ensure we engage the most suitable people to work with children and young people we verify the accuracy of the WWCC.

In accordance with the *Child Safety (Prohibited Persons) Act 2016*, Torrens Connect is registered with the DHS Screening Unit. All employees who will be working in a role with children and young people must hold a current, not prohibited WWCC issued by the Screening Unit of the Department of Human Services, provide evidence of this prior to employment and renew this every 5 years. We will verify the accuracy of all WWCCs in the DHS Screening Unit portal as required by law.

We will immediately contact the Department of Human Services Screening Unit when we become aware of certain information regarding any person involved with our organisation, including any serious criminal offence, child protection information, or disciplinary or misconduct information.

We have strategies in place to train and support employees to understand the Torrens Connect Child Safe Environments Policy, their mandatory reporting obligations and their responsibilities to create a child safe and friendly environment.

At induction we ensure that all employees have read and understood the Mandatory Notification Information Booklet.

Communication

This Child Safe Environments Policy and related documents are available on our website, and on request.

This Child Safe Environments Policy and related documents are provided to all employees as part of their induction following recruitment.

We encourage and respect the views of children and young people and involve them in decision making as appropriate. We provide clear age-appropriate or developmentally appropriate explanations to children and young people including their right to safety, their right to be listened to and that they can provide feedback or make a complaint if they have a concern, to any Torrens Connect employee or ask their parent/guardian to do this on their behalf. We will listen to and act upon any complaints or concerns that a child or young person raises with us.

We will display information posters within our depots on how to provide feedback.



Code of Conduct

All Torrens Connect employees are responsible for promoting and protecting the safety and wellbeing of children and young people by:

- following the Torrens Connect Child Safe Environments Policy at all times and taking all reasonable steps to ensure the safety and protection of children and young people
- treating everyone including those of different race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes and religious beliefs with respect and honesty and ensure equity is upheld
- being a positive role model to children and young people in all conduct with them
- setting clear boundaries about appropriate behaviour between yourself and children and young people – boundaries help everyone to understand their roles
- listening and responding appropriately to the views and concerns of children and young people
- being alert to bullying behaviours or signs of discomfort and responding promptly and appropriately
- ensuring another adult is always present or in sight when conducting one to one consulting, coaching, instruction or other activity
- being alert to children and young people who have been harmed, or may be at risk of harm and reporting this quickly to the Child Abuse Report Line (13 14 78)
- responding quickly, fairly and transparently to any complaints made by a child, young person or their parent/guardian
- encouraging children and young people to ‘have a say’ on issues that are important to them
- when performing ticket checks, Prescribed Officers to be discreet and understanding when talking to a child or young person who does not have a valid ticket

Torrens Connect staff must not:

- engage in rough physical games
- develop any ‘special’ relationships with children and young people that could be seen as favouritism such as the offering of gifts or special treatment
- do things of a personal nature that a child or young person can do for themselves, such as toileting or changing clothes
- discriminate against any child or young person because of age, gender, cultural background, religion, vulnerability or sexuality.

Breaches or suspected breaches of the Code of Conduct should be reported as soon as practicable to Amy Radford, Head of People and Culture either in person, by telephone on 08 8473 0000, or via email at amy.radford@torrensconnect.com.au, alternatively a report can be made as per the Whistle-blower Procedure by contacting the Eligible Disclosure Recipients or via the Whistle-blower Disclosure Form. Breaches or suspected breaches of the Code of Conduct will be taken seriously and dealt with quickly, fairly and transparently.

Any employee who breaches the Code of Conduct will face disciplinary action and depending on severity of the breach, the employee may have their employment terminated.

Reporting and responding to harm or risk of harm

We aim to ensure that children and young people are safe from harm and risk of harm.

Mandated notifiers in our organisation are employees who:

- provide services to children and young people
- hold a management position in the organisation the duties of which include direct responsibility for, or direct supervision of, the provision of those services to children and young people.

Mandated notifiers have a legal obligation to notify the Child Abuse Report Line (CARL) on 13 14 78 as soon as practicable if they have a reasonable belief that a child or young person is or may be at risk of harm. If the child or young person is at immediate risk, report to South Australia Police (SAPOL) on 000. In cases involving Aboriginal children and young people, support is provided by Yaitya Tiramangkotti - an Aboriginal team, via the CARL number.

Even if not a mandated reporter, any person can report harm or risk of harm to a child or young person. The individual who identifies the harm or risk of harm is encouraged to make the report to authorities and can request the support from another employee to do so if required.

Information about making appropriate reports of harm or risk of harm is available from the South Australian Department of Child Protection website: <https://www.childprotection.sa.gov.au/reporting-child-abuse>.

All adult employees (even if not a mandated notifier) have a legal obligation to report child sexual abuse to the police and to protect a child from sexual abuse. Failure to meet these obligations may be considered a criminal offence.

Following a report being made to CARL or SAPOL employees must make an internal report to management.

We will be guided by the Department for Child Protection and/or SAPOL after a report has been made as to whether we can conduct an internal investigation.

If an employee is reported to CARL or SAPOL for causing harm or risk of harm to a child or young person, they will be removed from any role that involves working with any child or young person until authorities have concluded their investigation.

Following a report to CARL or SAPOL we will support the child or young person by:

- referring the child, young person or their family to other appropriate services
- continuing to provide a service to the child, young person and their family and monitor their circumstances.

We will document all information received regarding the report and store this securely in a separate file.

Vigilance and prompt action contribute to our collective effort in safeguarding the welfare of children and young people who rely on public transport.

Reporting and responding to general complaints/feedback

Providing opportunities for complaints and feedback ensures that children, young people and their families feel valued and respected and enables us to improve the quality of our service. Children, young people and their families are informed that they can provide feedback or make a complaint directly to Torrens Connect employees or via Adelaide Metro.

Child Safe Environments Policy



Compliments, complaints or feedback can be provided verbally or in writing to any Torrens Connect employee or direct to the Adelaide Metro InfoLine on 1300 311 108 or via adelaidemetro.com.au/about-us/contact-us.

We will deal with all complaints and feedback received from children, young people or their families promptly, sensitively and fairly. We will:

- listen to the complaint/feedback
- the person receiving the complaint will make a record of it if received verbally
- advise of the time expected for an outcome
- if an employee receives a complaint, they must forward it to management as soon as possible
- management will respond to the complainant with within 3 days and keep informed of progress to outcome
- clearly document and securely store decisions and actions taken in response to complaints and feedback
- make sure that procedural fairness is followed at all times.

If the child, young person or their family is not happy with the outcome from the complaints process they can contact:

- Department for Infrastructure and Transport (DIT): www.dit.sa.gov.au Tel: 1300 872 677
- Australian Human Rights Commission Online: www.humanrights.gov.au Tel: 1300 656 419

Torrens Connect trams and buses are fitted with CCTV cameras. Footage can be downloaded when required. In any unlawful event which may involve a child or young person, the organisation will advise and cooperate with law enforcement and associated agencies.

Risk management

To support and maintain a safe environment for children and young people, Torrens Connect will continue to review, identify and assess potential sources of harm and take steps to decrease the likelihood that harm will occur to children and young people who use our services.

The risks identified that are relevant to Torrens Connect are:

Identified risk	Actions to minimise
Culture of organisation is not child-safe focussed	<ul style="list-style-type: none">– child focused Code of Conduct is in place that sets the behavioural standards expected including what happens when a breach occurs– culture of management reflects our strong commitment to the safety of children and young people– the National Principles for Child Safe Organisations are embedded in policies and procedures– we meet the requirements of the Children and Young People (Safety) Act 2017 (which mandates child safe environments) and the Child Safety (Prohibited Persons) Act 2016 (which mandates Working with Children Checks)



Child Safe Environments Policy



Employees harm children/young people

- recruitment processes including undertaking referee checks to ensure the suitability of persons before they are employed/volunteer with our organisation
- all employees have WWCC with 'not prohibited' result prior to working with children and young people
- WWCCs updated every 5 years and status remains as not prohibited
- children and young people and their families are able to access the Torrens Connect Child Safe Environments Policy and complaints and feedback process via our website

Employees don't understand their obligations to report harm and risk of harm to the Child Abuse Report Line (or SA Police if child/young person is at immediate risk)

- all employees trained in Safe Environments – Through their Eyes on commencement and refresher training every 3 years after
- all employees must abide by the Torrens Connect Child Safe Environments Policy and Code of Conduct (latter is signed on commencement with organisation)
- information about how to report concerns or provide feedback displayed on notice boards at all sites

Physical contact

- any physical contact must be appropriate to the delivery of services being provided
- where physical contact is required, this is undertaken in a safe way by explaining why contact is required and what will happen, and asking the child/young person for their permission (or their family if this is more appropriate) before proceeding
- unnecessary physical contact is not allowed

Transport of children and young people

- employees must not transport a child or young person unless specifically approved
- parents/guardians must provide consent before transporting a child or young person
- the employee must have a valid, unrestricted driver's licence
- the vehicle must be registered, insured and in roadworthy condition
- an employee must not be alone in a vehicle with a child or young person

Supervision

- children and young people who are separated from their parents/guardians are to be supported, in line of sight of another adult until reunited with their parents/guardians
- if a child or young person has missed their stop or boarded the wrong service, their name, address, and a contact phone number is obtained, in line of sight of another adult, and the depot contacted for further instructions
- when providing one to one consultation with a child or young person, it will be in line of sight of another adult



Child Safe Environments Policy



Taking images of children and young people

- consent of child young person and their parent/guardian required
- disclosure will be made as to how the image is to be used and consent must be provided by the child, young person and parent/guardian
- images must be presented in a way that de-identifies the child or young person

Physical environment

- maintain a risk register that is reviewed annually to ensure effectiveness
- conduct risk assessments for all activities
- ensure all equipment is in good working order

Privacy and confidentiality

- all documents containing confidential information will be stored privately in a locked filing cabinet (or similar place with restricted access)
- digital files containing confidential information shall be protected electronically by restricting the access to only those requiring it to perform their duties
- employees must not disclose information regarding any child or young person without written consent of the child, young person and their parent/guardian

Related policies, procedures and further information

Related policies and procedures that support our Child Safe Environments Policy:

- Code of Conduct
- Workplace Discrimination and Harassment Policy
- Whistle-blower Policy and Procedure

Our policy complies with the *Children and Young People (Safety) Act 2017*, *Child Safety (Prohibited Persons) Act 2016* and the *National Principles for Child Safe Organisations*.

Further information about the Child Safety Laws <https://www.playbytherules.net.au> can be found on the Department of Child Protection website <https://www.childprotection.sa.gov.au/>.

Policy Review

Torrens Connect will, at a minimum, review this policy and the related procedures once every 5 years as required by the *Children and Young People (Safety) Act 2017*. We will also review this policy when:

- new or added risks are identified for children or young people, which may require a change in the policy or procedures
- a critical incident where a child or young person has experienced harm through involvement in the organisation
- concerns are raised by anyone involved in your organisation about child safety or welfare in the organisation



Child Safe Environments Policy



- awareness or compliance to the Child Safe Environments policy is low
- legislative changes/requirements.

Torrens Connect will lodge a new child safe environments compliance statement with the Department of Human Services each time we review and update this policy.

Policy Date: 12 February 2024

Review Date: 12 February 2029

Digitally Signed By:

General Manager - Paul Burns at:15/02/2024 15:25

General Manager

[Torrens Connect](#)

