

# Child Safe Policy

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## 1 Policy alignment

This policy meets the legislative requirements of the Child Safe Standards as well as the moral and ethical obligations Cardinia Shire Council (Council) takes seriously to keep children safe and protected from abuse.

This policy is intended to be read in conjunction with the Employee and Councillor Code of Conduct.

## 2 Purpose

Cardinia Shire Council has zero-tolerance towards abuse and neglect of children and young people. We are committed to the rights of all children to feel safe and be safe when participating in Council activities, services and programs. Engagement of a child can happen incidentally and need not be planned or coordinated. Being a child safe organisation is therefore everyone's responsibility at Council.

The purpose of this policy is to ensure that all Council employees are aware of our commitment to being a child safe organisation. It provides strategic and operational guidance to keep children safe, and outlines the responsibilities, procedures and practices that support this. It applies to all operational environments and without fail wherever children are participating in our organisation's activities, programs and services.

## 3 Scope

This policy applies to all Cardinia Shire Council employees including contractors.

## 4 Background

## **Child Safe Standards**

In 2015, the Victorian *Child, Wellbeing and Safety Act 2005* was amended to include the Child Safe Standards. The Victorian Child Safe Standards are in place to support organisations that provide services

to children. They are a compulsory framework used to implement policies and procedures to prevent, respond to and report allegations of child abuse, harm and neglect.

In 2021, further amendments were made to strengthen the framework by replacing the existing seven standards and introducing eleven new standards:

Standard 1: Organisations establish a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal children and young people are respected and valued

Standard 2: Child safety and wellbeing is embedded in organisational leadership, governance and culture

Standard 3: Children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously

Standard 4: Families and communities are informed and involved in promoting child safety and wellbeing Standard 5: Equity is upheld and diverse needs respected in policy and practice

Standard 6: People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice

Standard 7: Processes for complaints and concerns are child-focused

Standard 8: Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training

Standard 9: Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed

Standard 10: Implementation of the Child Safe Standards is regularly reviewed and improved Standard 11: Policies and procedures document how the organisation is safe for children and young people

In 2017, the Child Wellbeing and Safety Amendment Act was amended to give power to the Commission for Children and Young People (CCYP) to oversee the Reportable Conduct Scheme. The scheme requires organisations to respond to allegations of child abuse made against their workers either within work or outside of work and to notify the CCYP of any allegations.

There are five types of 'reportable conduct':

- sexual offences committed against, with or in the presence of a child
- sexual misconduct committed against, with or in the presence of a child
- physical violence against, with or in the presence of a child
- any behaviour that causes significant emotional or psychological harm to a child
- significant neglect of a child.

#### 5 Policv

### Our commitment to child safety and wellbeing

Council is a child safe organisation which welcomes all children and their families. We are committed to providing an environment where children are safe and feel safe, where their participation is valued, their views are respected, and their voices are heard about decisions that affect their lives.

Our child safe policy, strategies and practices are inclusive of the needs of all children. Council ensures that children and young people are informed about their rights, including safety, information and participation. Council engages children and young people in a meaningful, respectful and authentic way. Our priority is to involve children and young people in opportunities to influence matters that affect them as valued citizens in their community.

#### **Child Safe Committee**

Cardinia Shire Council has established a Child Safe Committee to assist Council in identifying ways to strengthen child safety and to ensure the organisation remains aware of the implementation of the Child Safe Standards. The Child Safe Committee provides governance around the implementation of the Child Safe Standards and other activities that contribute to Council being a child safe organisation. The Committee meets quarterly to review relevant reports, breaches of this policy, internal investigations, and other serious incidents.

The Child Safe Committee includes members of Cardinia Shire Council's leadership team and the Child Safe Officers. Members include (but not limited to, as required):

- General Manager Liveable Communities
- Manager People and Culture
- Manager Active and Connected Communities
- Manager Community and Family Services
- Manager Governance

#### Diversity and inclusion

Through Cardinia Shire Council's Cultural Diversity Plan, Council commits to creating accessible, equitable, inclusive and culturally safe facilities and services for children. Council will achieve this by:

- welcoming and supporting participation of all children, including children from a culturally and linguistically diverse background, children with disability and Aborigial and/or Torres Strait Islander children and their families
- providing children and their families with access to information, support and complaints processes in ways that are culturally safe, accessible and easy to understand
- having a zero tolerance to racism and discrimination

#### Recruitment

Council undertakes a comprehensive recruitment and screening process for all employees that aims to:

- Promote and protect the safety of all children
- Prevent a person from working at Council if they pose a risk to children

Council has developed sleection criteria and position advertisement which clearly demonstrate a commitment to child safety and an awareness of our social and legislative responsibilities. Council's recruitment processes actively encourages applications from Aboriginal and Torres Strait Islander people, people from culturally and/or linguistically diverse backgrounds and people with a disability.

Our recruitment process is free from discrimination, with respect to inclusion and equal opportunity. Where possible, candidates are appointed who represent the diverse range of children and young people and their families within Cardinia Shire.

Council undertakes thorough reference checks including questions relating to child safety as per our Talent Management Policy. Other tools used during recruitment include an explicit statement of commitment to child safety in all position descriptions as well as the inclusion of child safe questions in all interview guides. We require our employees to disclose criminal convictions or charges affecting their suitability to work with children and young people both prior and during their employment.

#### Working with Children Checks (WWCCs)

Cardinia Shire Council has defined two categories in relation to WWCC requirements:

- "Child Related Work" and those roles that require a WWCC as part of their work in the community
- "Non Child Related Work"

'Child Related Work' means being engaged in:

- a) work activities where contact (physical, face-to-face, oral, written or electronic contact) between an employee and a child would reasonably be expected as a normal part of the work and such contact is not occasional and incidental to the work, or
- b) where the work undertaken within the community requires a WWCC

For the purposes of this definition, occasional means infrequently or irregularly; and incidental means occurring by chance.

Employees working within 'Child Related" roles cannot commence until proof of a valid WWCC has been provided. Proof of an application will not suffice as clearance is required as an inherent requirement of the role. Obtainment of a WWCC will be at the expense of any new employee however council will reimburse the cost of renewals for employees that require a WWCC as part of their employment.

It is the employees responsibility to ensure their WWCC is current and valid at all times. This means that employees must renew their WWCC before it expires. Employee must immediately notify People and Culture upon becoming aware that their WWCC will be, or has been, suspended, revoked or has expired. Where an employee's WWCC is suspended, expired or revoked, Council may at its discretion stand the employee down (or accrued leave may be utilised). Termination of employment may result in cases where an employee's WWCC has expired or has been suspended or revoked and:

- the employee is unable to perform all the inherent requirements their position; and/or
- the employee has (non-exhaustively) engaged in conduct that contravenes Council policies (including the Employee Code of Conduct).

'Non-Child Related' work is an activity that involves <u>incidental</u> contact with a child. Roles that meet the definition of incidental contact with a child, will not require a valid WWCC as an inherent requirement of their role and will not be asked to provide a WWCC as part of the recruitment process.

#### Training

Council is responsible for ensuring that appropriate behaviour with children and young people is clearly defined and expectations are accessible and understood by all employees. These expectations are detailed in Council's Code of Conduct which all employees are required to agree and adhere to.

All employees are required to attend Council's child safe training as part of induction, as well as complete compulsory online Child Safe Standards training . Refresher training is rolled out every two years.

Ongoing supervision and support are also provided to employees to ensure compliance with the Child Safe Policy, Child Safe Standards and to increase their capacity to establish and maintain a culture of child safety.

# 6 Responding and Reporting a Child Safety Concern

Cardinia Shire Council takes all allegations of child abuse, harm or neglect seriously and will investigate all allegations appropriately. Council has implemented processes and training to ensure all employees are aware of both their own and the organisations legal obligations when responding to allegations of child abuse. This includes an understanding of the following:

- Failure to disclose
- Failure to protect
- Mandatory reporting
- Grooming

### **Child Safety Officers**

All incidents or allegations of child abuse, harm or neglect should be reported to the Child Safety Officer or the Manager People and Culture. The role of the Child Safety Officer includes:

- Offering support to the person who reports and/or the employee
- Initiate internal processes to ensure the safety of all children/young people, clarify the nature of the complaint and commence an investigation if appropriate
- Determine in partnership with the CEO and Manager People and Culture, whether the matter must be reported to Police, DFFH or CCYP.

#### Reporting

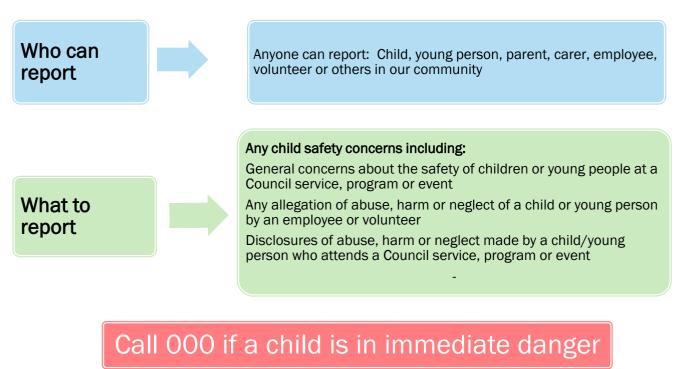
Allegations or incidents can be reported by anyone including a child, young person, parent, carer, Councillor, employee, volunteer, contractor or community members. If a person is unsure as to whether to report, they should contact the Child Safety Officer's to discuss their concerns, or in the case of Councillors, the CEO.

In the case that a report has been made regarding a child's safety where an employee is implicated, the Police or DFFH may decide to commence their own investigation. All employees must co-operate fully with the investigation.

The Manager People and Culture will consult with the authorities throughout the investigation and determine whether an internal investigation is also required as stipulated by the Reportable Conduct Scheme. If an internal investigation is required, all employees must co-operate fully with the investigation. Any such investigation will be conducted according to the rules of procedural fairness and natural justice. Every effort will be made to keep any such investigation confidential however, there may be occasions where other employees may need to be consulted in conjunction with the investigation. If it is alleged that an employee has committed an offence or has breached Council's policies or its *Employee Code of Conduct* regarding child safety, the employee may be stood down while an investigation is conducted.

If the investigation concludes that on the balance of probabilities an offence has occurred then disciplinary action may follow, up to and including termination of employment. The findings of the investigation will also be reported to other authorities as required. For further information on disciplinary processes please refer the relevant policy found on CardiNet.

## **CARDINIA SHIRE COUNCIL'S CHILD SAFE REPORTING PROCESS**



Who to report to and how For any concerns or complaints relating to a Council service, program or event our *Complaints Handling Policy* will be followed. This can be found at www.cardinia.vic.gov.au For a complaint or allegation concerning abuse, harm or neglect of a child or young person by a Cardinia Shire Council employee: Contact the Child Safety Officer **Email childsafe@cardinia.vic.gov.au** or call 1300 787 624 and ask to speak our Child Safety Officer or Manager People and Culture

#### The Child Safety Officer or Manager People and Culture will:

1. Offer support to the child, parents/carers, the person who reports and the implicated employee

2. Initiate internal processes to ensure the safety of the child, clarify the nature of the complaint

3. Decide, in conjunction with the CEO and in accordance with legislative requirements and duty of care, whether the matter should/must be reported to the Police or DFFH and/or the CCYP and make a report as soon as possible if required.

Outcome

What happens

next?

Investigation complete. Relevant employees, parents/carers child/young person notified of the outcome.



If necessary, disciplinary action will be taken against the implicated employee.

Policies and procedures to be reviewed and updated where necessary.

## Support

Where appropriate, following a reported child safety concern, Council will:

- Assist victims and their families to access counselling and support services
- Provide and encourage any employees who may be impacted and requiring further support to contact Council's Employee Assistance Program, Converge on 1300 687 327

#### Privacy, Information sharing and record keeping

Child safety incident reports are stored in Elumina. Access to child safety incident reports in Elumina is limited to the Manager People and Culture, General Manager Liveable Communities and Chief Executive Officer.

All personal information collected or recorded will respect the privacy of the individuals involved; whether they be employees, parents, or children - unless there is a risk to someone's safety. Everyone is entitled to know how this information is recorded, what will be done with it, and who will have access to it. Wherever possible Council services seek consent from parents/carers when sharing information about a child. However, if it is deemed that by not sharing information a child could be placed at harm, then information will be shared without consent, provided that this is required or permitted by legislation.

### **Risk Management**

All activities and facilities must be assessed using our risk assessment tool to identify the possible risk of child abuse, this will include:

- vulnerability and environmental risks
- implementing appropriate preventative measures to reduce the risk of child abuse, harm or neglect
- educating employees on their responsibility for identifying risks of child abuse, harm and neglect and their obligation to work with management on reducing those risks.

All risk assessments are documented and are updated as required. Families and children are made aware of how to report allegations of child abuse.

## 7 Roles and Responsibilities

Ensuring the safety, welfare and wellbeing of children is the responsibility of all employees. Key responsibilities are outlined below.

### **Chief Executive Officer**

The CEO is responsible for ensuring Council has a culture where protecting children from the risk of abuse or harm is embedded in the everyday thinking and practice of all employees across Council.

The CEO also has specific obligations as the 'Head of an Applicable Entity' to make reports under the Reportable Conduct Scheme. If the CEO becomes aware of a child abuse allegation against an employee then they must make a specific report to the CCYP.

### Senior Leadership Team and People Leaders

The senior leadership team and all managers are responsible for promoting the importance of child safety within the organisation and how it fits within the day to day work of employees. This will be achieved by:

- Demonstrating an understanding and commitment to this policy
- Ensure child safety is considered when developing risk assessments for any business activities that are associated with children and/or young people within their business unit

- Ensure child safety is in the design of programs and policies that impact upon children
- Ensure appropriate child safe clauses are included in supplier contracts or grant applications
- Monitor the contract's compliance in relation to child safety
- When managing grants and procurement, take into account child safety implications if the services are for children, or for activities that will or may involve contact with children, that are a usual part of, and more than incidental, to the services or grant activity.
- Provide immediate feedback and take immediate action when an employee may not be meeting their obligations under this policy.

### Employees

All employees are responsible for ensuring the safety, participation and wellbeing of children whilst undertaking their roles. This can be achieved by:

- Promoting child safety at all times
- Completing child safety training as directed.
- Comply with Cardinia Shire Council's Code of Conduct.
- Comply with all relevant requirements of this policy in the course of their work
- Appropriately report potential risk to child safety including any breaches of this policy.
- Obtain and maintain a Working with Children Check (where required) and comply with the appropriate legislative requirements based on the jurisdiction, including reporting a change in circumstances and mandatory reporting requirements.

#### **Child Safety Officers**

Council will maintain a commitment to three or more Child Safety Officers across the organisation. The Child Safety Officers will act as the first point of contact for receiving reports of child safety concerns or allegations of abuse and ensure that all reportable incidents are managed effectively in compliance with all legislative obligations.

#### Child Safety Committee

Council has established a Child Safety Committee to assist Council in identifying ways to strengthen child safety and to ensure the organisation remains aware of the Child Safe Standards. The Child Safety Committee provides governance around the implementation of the Child Safe Standards and other activities that contribute to Council being a child safe organisation. The Committee meets quarterly to review reports, breaches of this policy, internal investigations, and other serious incidents.

#### Manager People and Culture

In conjunction with the Child Safety Officers, the Manager People and Culture wil act as the point of contact for receiving reports of child safety concerns or allegations of abuse and ensure that all reportable incidents are managed effectively in compliance with all legislative obligations.

#### People and Culture

People and Culture will maintain the following:

- Maintain a register of Working with Children Check
- Periodically review and audit the currency of Working with Children Checks
- Monitor compliance of child safety training for employees
- Assist employees to contact the Child Safety Officer/s to make complaints if required
- Assist business areas to implement child safe recruitment practices
- Assist employees to access the Employee Assistance Program (EAP)

## 8 Compliance

### **Policy Review**

Council will review all child safe practices and policies at least every two years along with any relevant practices and policies in response to a child safety incident or 'near miss'. Findings from reviews will be

reported and will also inform our approach to continuous improvement of our child safe practices. Reviews are overseen by the Child Safety Committee and will be informed by consultation with children, families and employees.

#### Recourse for non-compliance

All employees are required to adhere to their responsibilities in regard to the application of this policy. Failure to adhere to any aspect of this policy may constitute a breach of the Code of Conduct and may result in disciplinary action that could include termination of employment.

Given the importance of the child safe obligations and the potential risks to children of non-compliance, if a third party supplier (the Supplier) does not comply with the child safe clause in their contracts or agreements, Council will take immediate action to address the non-compliance.

Relevant Legislation	<ul> <li>Crimes Act 1958</li> <li>Privacy Act 1988</li> <li>Public Service Act 1999</li> <li>Victorian Working with Children Act 2005 and Amendment 2014</li> <li>Commonwealth Child Safe Framework</li> <li>Child Wellbeing and Safety Act 2005 (VIC) (including Child Safe Standards)</li> <li>Children, Youth and Families Act 2005 (VIC) (including reporting to Child Protection)</li> <li>Commission for Children and Young People Act 2012</li> <li>Charter of Human Rights and Responsibilities Act 2006</li> <li>Disability Act 2006</li> <li>Privacy and Data Protection Act 2014 (VIC)</li> <li>Health Records Act 2001 (VIC)</li> </ul>
Policies	<ul> <li>Employee Code of Conduct</li> <li>Managing Workplace Complaints and Grievances</li> <li>IT and Social Media Policies</li> <li>Talent Management Policy</li> </ul>
Strategies	<ul> <li>Diversity and Equity Plan</li> <li>Child, Youth and Family Strategy</li> </ul>

## 9 Related documents

# 10 Glossary of terms

Term	Definition
Aboriginal and/or Torres Strait Islander Children	Children up to the age of 18 who are Aboriginal and/or Torres Strait Islander, identify as Aboriginal or Torres Strait Islander, and is accepted as Aboriginal or Torres Strait Islander by an Aboriginal or Torres Strait Islander Community.
CardiNet	Cardinia Shire Council's Intranet
Child	In accordance with the United Nations Convention on the Rights of the Child, child means any human under the age of 18 years.
Child abuse	Any act committed against a child involving physical violence, sexual offences, serious emotional or psychological abuse or serious neglect. There are a number of types of abuse defined within the Children, Youth and Families Act 2005 (Vic): • Physical • Sexual • Emotional • Neglect • Cumulative harm • Leaving children unattended
Child protection	An activity or initiative designed to protect children from any form of harm, particularly that arising from child exploitation and abuse.
Contact with a child	means physical contact, face-to-face contact, written communication, oral communication, or electronic communication. Contact does not include providing information to children on our website or through other means where there is no exchange of information or communication with a child.
Council	means Cardinia Shire Council, being a body corporate constituted as a municipal Council under the Local Government Act 1989.
Emotional abuse	A parent or caregiver's inappropriate verbal or symbolic acts towards a child and/or a pattern of failure over time to provide a child with adequate non-physical nurturing and emotional availability. Such acts of commission or omission are likely to damage a child's self-esteem or social competence.
Department of Families, Fairness and Housing (DFFH)	The department is responsible for child protection.

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Failure to disclose	As defined in the Crimes Act 1958 (VIC), a failure to act on the legal obligation upon all adults to report to Victoria Police where they form a reasonable belief that a sexual offence has been committed by an adult against a child under the age of 16 (16 being the legal age of consent)	
Failure to protect	As defined in the Crims Act 1958 (VIC) a person with power and authority who fails to protect a child from criminal sexual abuse, they know of the risk of abuse, and are able to reduce or remove the risk but fail to do so.	
Grooming	The predatory conduct designed to facilitate later sexual activity with a child. Grooming can include communicating (including online) and/or attempting to befriend or establish a relationship or other emotional connection with the child or their parent/carer or colleagues.	
Mandatory reporting	<ul> <li>The legal requirement for certain professional groups to report a reasonable belief of child physical or sexual abuse to Child Protection authorities. In Victoria mandated reporters must make a report to Child Protection, if:</li> <li>In the course of practicing their profession or carrying out duties of their office, position or employment</li> <li>They form a reasonable belief, that a child has been or is at risk of significant harm, as a result of physical or sexual abuse, and</li> <li>The child's parents have not protected or are unlikely to protect the child from that abuse.</li> </ul>	
Neglect	The failure by a parent or caregiver to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for the physical and emotional development and wellbeing of the child.	
Physical abuse	The use of physical force against a child that results in harm for the child's health, survival, development or dignity. This includes, but not limited to, hitting, beating, kicking, shaking, biting, strangling, scalding, burning, poisoning and suffocating.	
Reasonable belief	If a reasonable person, doing the same work, would have formed the same belief on those grounds, based on the same information. It does not require the belief to be based on 'proof' but needs to be stronger than a vague rumour.	
Sexual abuse	The use of a child for sexual gratification by an older or significantly older child, adolescent or adult.	
Working with Children Check	An assessment of whether a person poses an unacceptable risk to children. As part of this process, the applicant's criminal history, child protection information and other information is checked.	

# Appendix 1

## **Employee Reporting Process**

If you have concern about the safety of a child where:

- You have reasonable belief that a child is being abused/harmed or is at risk of being abused/harmed and may require protection
- An allegation of abuse to a child has been made
- A child informs you they have been abused or harmed
- You observe inappropriate conduct towards a child
- A breach of this policy has occurred

## 1. Assess Immediate Danger

Consider if the child is in immediate danger. If so, police <u>must</u> be contacted immediately on 000.

## 2. Gather Preliminary Information

If a child is not in immediate danger, it will be important to begin gathering as much information as possible. Anyone can take notes and gather information. It is important that this is taken seriously, and every detail is documented including times, locations, and names.

Below are some useful tips to obtain this information; IF THE INFORMATION COMES FROM A CHILD

- Try and separate them from the other children discreetly and listen to them carefully.
- Let the child use their own words to explain what has occurred.
- Reassure the child that you take what they are saying seriously, it is not their fault and that they are doing the right thing.
- Do not make promises to the child such as promising not to tell anyone about the incident, except that you will do your best to keep them safe.
- Do not leave the child in a distressed state. If they seem at ease in your company, stay with them until they can be left in the care of someone they're safe and comfortable with.

### IF A PARENT OR CARER SHARES INFORMATION OR RAISES A CONCERN

- Explain that Cardinia Shire Council has processes to ensure all abuse allegations are taken very seriously.
- Ask about the whereabouts and wellbeing of the child to once again ascertain if there is immediate danger
- Allow the parent/carer to talk through the incident in their own words.
- Advise that you will take notes during the discussion to capture all details.

### 3. Notify

Relay the information to a Child Safety Officer or Manager People and Culture. If you relay the information to your supervisor, they will provide it to a Child Safety Officer. The Child Safety Officer will contact you and;

- Discuss your concerns with you and advise of options.
- Assess if a notification to the DFFH is required, and support you in making that notification.
- Support you to document details in Elumina as soon as possible

If a Child Safety Officer or Manager People and Culture is unavailable and you require further information on how to proceed, please contact Department of Families, Fairness and Housing Services Child Protection (South Division) 1300 655 795 (after hours on 13 12 78).

# Appendix 2

## **Child Safety in Employee Code of Conduct**

All employees and contractors of Cardinia Shire Council are required to observe child safe principles and expectations for appropriate behaviour towards and in the company of children, as noted below.

Everyone at Council is responsible for supporting the safety, participation, wellbeing and empowerment of children by:

- treating everyone with respect
- adhering to the Cardinia Shire Council Child Safe Policy and upholding the organisation's statement of commitment to child safety at all times
- taking all reasonable steps to protect children from abuse, harm or injury
- listening and responding to the views and concerns of children, particularly if they are telling you that they or another child have been abused and/or are worried about their safety or the safety of another
- if an allegation of child abuse, harm or neglect is made, ensure as quickly as possible that the child(ren) are safe
- considering any actions carefully (consult with Child Safety Officer or Manager People and Culture) if a child discloses they are being/or have been abused to prevent placing the child at risk from further harm by the perpetrator
- reporting any allegations of child physical and sexual abuse to DFFH and where required Victoria Police
- reporting child safety and wellbeing concerns to DFFH.
- promoting the cultural safety, participation and empowerment of Aboriginal and Torres Strait Islander children
- promoting the cultural safety, participation and empowerment of children with culturally and/or linguistically diverse backgrounds (for example, by having a zero tolerance of discrimination)
- promoting the safety, participation and empowerment of children with a disability (for example, during personal care activities)
- promoting the safety, participation and empowerment of children regardless of their sexual orientation or gender identity
- encouraging children to 'have a say' and participate in all relevant organisational activities that include them, especially on issues important to them or decisions that are made about them
- consulting with their supervisor or a Child Safety Officer's where there is uncertainty.

### Employees must not:

- ignore or disregard any suspected or disclosed child abuse
- discriminate against any child, including because of culture, race, ethnicity, sexuality, gender, age or disability
- develop any 'special' relationships with children that could be seen as favouritism (for example, the offering of gifts or special treatment for specific children)
- exhibit behaviours with children which may be construed as unnecessarily physical (for example inappropriate sitting on laps. Sitting on laps could be appropriate sometime, for example while reading a storybook to a small child in an open plan area)

- put children at risk of harm (for example, by locking doors)
- do things of a personal nature that a child can do for themselves (for example, toileting, changing clothes)
- engage in open discussions of a mature or adult nature in the presence of children (for example, personal social activities)
- use inappropriate language in the presence of children
- express personal views on cultures, race, or sexuality in the presence of children.