



Australian Children's  
Education & Care  
Quality Authority

# SIX REASONABLE STEPS TO ENSURE STAFF FOLLOW POLICIES AND PROCEDURES



**This guide breaks down six reasonable steps with suggested strategies and examples of documented or observable evidence of practice that an approved provider may consider to ensure and demonstrate their compliance with regulation 170.**

It is an approved provider's responsibility to ensure staff follow their service's policies and procedures, and they must take reasonable steps to meet this obligation under regulation 170. How approved providers, and their services, take reasonable steps may look different, depending on the specific requirements of each policy and procedure and the issue they are designed to address. For further information on the individual requirements of each policy and procedure under the National Quality Framework, approved providers may refer to [ACECQA's national guidelines](#).

\*The requirements of regulation 170 capture a range of staff of centre-based and family day care (FDC) services, whether engaged as employees or contractors, including nominated supervisors, educators, assistant educators, FDC coordinators, FDC educators, FDC educator assistants, volunteers and other staff members. This includes temporary staff engaged through labour hire or recruitment agencies.

The strategies an approved provider uses, particularly where it holds many service approvals, will vary and are influenced by local factors such as the:

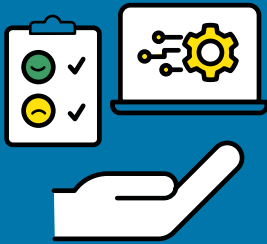
- service type, size, location, and availability and use of technology
- needs of staff and families, including cultural, language and access needs.

These strategies and examples are not intended to be prescriptive or exhaustive, and unless required by law, retaining the listed evidence is not mandatory.

Documentation that is timely and contains sufficient details including dates and names of relevant parties, can support an approved provider to demonstrate compliance in their practice. Authorised officers can also gather evidence through discussions with staff and observing practice.

These steps will help ensure staff follow a service's policies and procedures:

### 1. Accessibility



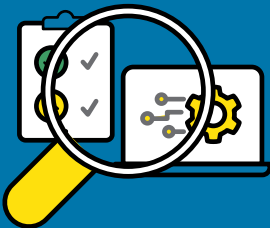
Policies and procedures are readily available and accessible to staff as required.

### 2. Induction and training



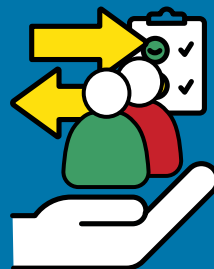
Staff are given adequate onboarding and ongoing support to ensure up-to-date knowledge and skills, with a thorough understanding of responsibilities.

### 3. Quality assurance and governance



Policies and procedures are regularly reviewed and maintained.

### 4. Monitor and audit compliance



Implementation of policies and procedures is regularly monitored to ensure staff are following them correctly.

### 5. Reformative action

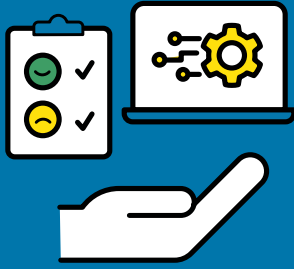


Non-compliance with policies and procedures is promptly addressed.

### 6. Resourcing and support



Adequate resources and time are allocated to enable staff to comply with policies and procedures.



## 1. Accessibility

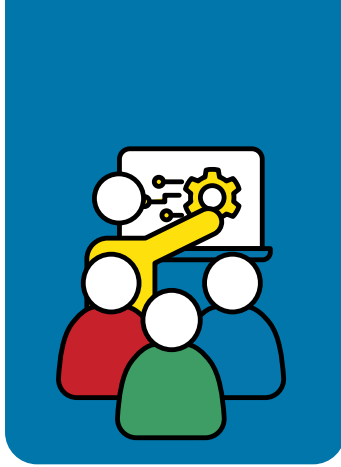
Policies and procedures are readily available and accessible to staff as required.

### Suggested strategies

- As it is a regulatory obligation to ensure that copies of current policies and procedures are readily accessible to staff members (see regulation 171), consider a process for monitoring your compliance with this regulation at each service.
- Ensure staff know where and how to readily access the latest versions of policies and procedures and any supporting tools or documentation such as checklists or templates. How staff access these documents will vary depending on the service type, size and systems, and the staff member's role.
- Assess the needs of staff and families and, where required, provide policies and procedures in multiple languages or an appropriate alternative such as online translation software and/or in audio versions.
- Consider the needs of any temporary or casual staff and how they will access the policies and procedures.

### Examples of evidence

- An FDC service's register of educators, coordinators and educator assistants shows that during support visits, the coordinator provided educators with advice and written materials on how to access policies and procedures. This may have included instructions on how to download the documents from the service's websites or portals.
- Staff members can show an authorised officer how they independently and readily access the latest version of their service's policies and procedures, whether in hardcopy or from the service's software system.
- Documents demonstrate a needs assessment of staff and families has occurred at induction or enrolment on accessing policies and procedures. Documents are provided in languages other than English or via audio or other forms, as necessary.
- Physical or electronic records, including version numbers show that the service is reviewing, updating and following current policies and procedures, particularly after operational and legislative changes have come into effect.



## 2. Induction and Training

Staff are given adequate onboarding and ongoing support to ensure up-to-date knowledge and skills with a thorough understanding of responsibilities.

### Suggested strategies

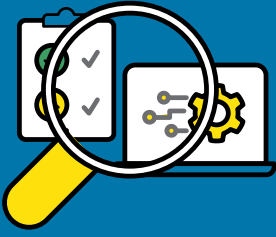
- Design an induction process for new staff that includes all necessary phases, such as: a process to provide and introduce service policies and procedures, orientation to contextualise the information to the service and role and the commencement of role-specific training on following policies and procedures, to support a thorough understanding.
  - During induction take the time to explain policies and procedures in detail, including links to the National Quality Framework so that new staff have a clear understanding of their responsibilities and how procedural steps meet the objectives of the policy and relevant legislative obligations.
  - Allow time for staff to process information, ask questions and discuss. Consider staggering the induction processes over a sufficient time period to support staff to engage with and digest the information.
  - When considering the training needs of staff, reflect on individual roles and responsibilities of staff to ensure training is relevant and effective. Consider what training will be required or recommended, reflective of staff position descriptions and legislative requirements.
  - Assess and determine how often policy and procedure refresher training is needed for all staff. This will depend on a range of factors including the level of risk associated with a policy and procedure, the extent of knowledge and specialised skills needed and the frequency of changes or updates to best practice in the relevant subject matter.
  - Offer training in a variety of formats, catering for all learning styles such as face-to-face, discussions at staff meetings, video demonstrations/vignettes, guest speakers/authorities delivering specific topics or online modules for individuals or groups.
- This may include staff presentations, practical demonstrations in real-time situations (where appropriate) and interactive discussions with the approved provider, nominated supervisor, FDC coordinator or a senior staff member.
- Request staff feedback on training to help ensure it is fit for purpose.
  - Regularly evaluate the outcomes of induction, orientation and training to identify and rectify any gaps in the service/s' systems, processes or materials, and whether the processes have met the individual needs of the staff members. Ensure these processes include opportunities for both the staff member and their supervisor to evaluate their progress.
  - Provide staff with ongoing support and supervision as required, based on the extent they have demonstrated competence at carrying out their responsibilities under the policies and procedures. Some staff may need more time, a longer period of supervision and/or further support, such as a key contact person (or buddy) until they develop a deeper understanding of the links between relevant policies, procedures and practices at the service and their supervisor is confident they can carry out the tasks independently.
  - Provide ongoing and regular training and other opportunities for professional development to all staff.
  - As soon as updates are made to policies, procedures or other supporting documentation, advise staff of the content of the changes and consider whether re-training is required. Conduct training as soon as possible to ensure staff can understand and follow any new requirements before the new version begins.



## Examples of evidence

- Records of formal training (individual or group participation) or formal performance development conversations and assessments of educator knowledge on individual staff files or the register of FDC educators, coordinators and FDC educator assistants. Records may include copies of educator training plans, staff meeting minutes, training attendance records, training certifications or copies of emails sent to staff about changes to and implementing policies and procedures.
- Informal training documented on staff files or in coordinator monitoring and support visit records, including notes of informal conversations between staff or management or evidence of any formal performance development conversations.
- Records of the training content, any staff feedback on content or delivery, and training reminder systems that support staff maintaining their skills and knowledge. This may also include any changes to the policies and procedures made as a result of staff feedback.





### 3. Quality assurance and governance

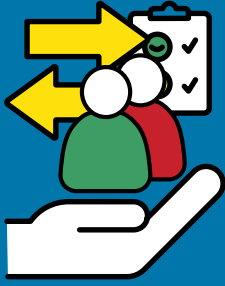
Policies and procedures are regularly reviewed and maintained.

#### Suggested strategies

- Keep informed of any relevant legislative amendments (not limited to the National Law) and revisions to evidence-based guidelines, such as Red Nose advice on safe sleep practices, and update policies and procedures accordingly.
- Consider whether policies or procedures need to be reviewed and updated following any accidents, complaints, near misses or other events.
- Ensure reviews and updates to policies and procedures include all associated forms, tools or templates.
- When a service-specific policy and/or procedure is updated, consider whether these changes should apply to any other, or all, services the approved provider operates. When policies and procedures are developed at the approved provider level, reflect on how they are applicable for each service and individual service context.
- Consider and encourage staff (in a variety of roles) to participate in reviews and seek regular feedback about the adequacy of policies, procedures and associated documentation. Support reflection on how current practice aligns with policies and procedures. If there is a discrepancy, support reflection on why and whether the practice, or the policy and procedure, needs to be adjusted.
- Consider a review schedule to support regular review and maintenance of policies and procedures, such as annually for a full policy and procedure review.
- As it is a regulatory obligation to ensure families are notified at least 14 days prior to changes to policies and procedures which may have a significant impact to the provision of care (see regulation 172), consider a process for keeping families informed of updates and changes to policies and procedures, prior to implementation.

#### Examples of evidence

- Copies of policies and procedures which meet current legislative requirements, particularly if recently changed.
- Documented procedures for carrying out, and copies of, reviews or investigations into incidents or complaints occurring at the service, in particular, examples where such a process has resulted in change to a policy and/or procedure.
- Documentation of engagement with staff about policy and procedure reviews including meeting notes, staff meeting minutes, online conversations, mind mapping or email conversations.
- Evidence of the service's systems for monitoring policies and procedures such as document version control and review strategies and schedules.
- Evidence of opportunities for staff to provide feedback on and review policies and procedures and how any feedback has been considered, addressed and incorporated.



## 4. Monitor and audit compliance

Implementation of policies and procedures is regularly monitored to ensure staff are following them correctly.

### Suggested strategies

- Regularly discuss the requirements, personal responsibilities and importance to the health, safety and wellbeing of children of policies and procedures with staff members. This may include during conversations while they are providing education and care, attending staff meetings or training, conducting home visits (for family day care services), participating in online forums (emails or group chat pages/sites) or during individual performance reviews. These discussions should provide a forum outside of training and review processes for staff to refresh their knowledge and clarify their understanding of requirements. Staff discussions may also identify any gaps between what the policy/procedure requires and what is occurring in practice.
- Proactively assess staff knowledge and skills including whether staff are complying in full with policies and procedures through activities such as:
  - confirm staff knowledge and understanding individually or in groups during daily conversations, staff meetings or training courses
  - discussing the implementation of policies and procedures at individual performance appraisals
  - observing staff practices regularly in real time during routine or monitoring and support visits.
- Provide feedback at the same time as assessing and observing staff, including to acknowledge and encourage compliant and quality practice.
- Regularly audit compliance with (correct implementation of) policies and procedures by carrying out activities such as
  - reviewing samples of CCTV footage, where available and appropriate, auditing access to, and the timely and accurate completion of, any required records about matters such as incidents, administration of medication, enrolment, transportation or excursions.
- Provide timely feedback to relevant staff following the outcomes of audits, including where no issues are identified.
- If recurring issues arise, assessing whether these issues are systemic, and identifying and addressing the root cause of the issues.

### Examples of evidence

- Records of any audits of policies and procedures including the time and date they were completed, and the outcomes.
- Copies of checklists or other evidence of staff knowledge about policies and procedures in training content or in staff meeting minutes.
- Documented discussions with educators, coaching and mentoring sessions, performance review documentation or notes recorded in educator registers (family day care).
- Copies of correspondence providing feedback on the outcomes of audits or monitoring.



## 5. Reformative action

Non-compliance with policies and procedures is promptly addressed.

### Suggested strategies

- Develop and maintain clear procedures for dealing with non-compliance with service policies and/or procedures, including procedures for establishing the cause of any non-compliance.
- Once the cause of non-compliance is understood, document clear pathways for improvement and who is responsible for taking these steps. These may include education and support, re-training staff members particularly in policies and procedures, additional supervision/monitoring of educators, performance management procedures and skill development or, in high-risk circumstances, staff dismissal.
- Promptly raise any issues of concern with staff members and develop escalation strategies for persistent or repeated non-compliance.
- Encourage and support staff to proactively self-identify and report instances of non-compliance or concerns with the implementation of policies and procedures without fear of reprisal.
- Provide information at staff induction on how they may raise concerns, anonymously if desired, and remind staff of this regularly.

### Examples of evidence

- Documented, on staff files or educator registers for family day care, any performance conversations/reviews that may include performance improvement strategies and action plans, staff undertakings, monitoring plans for educators, grievance procedures or termination processes.
- Records of any additional training or re-training conducted.
- Evidence of concerns staff members raise including anonymous feedback and how those concerns were considered and addressed.
- Evidence that staff members can discuss and raise any concerns about the implementation of policies and procedures.





## 6. Resourcing and support

Adequate resources and time are allocated to enable staff to comply with policies and procedures.

### Suggested strategies

- For centre-based services, ensure suitable staffing arrangements to allow staff enough time to carry out their duties under the policies and procedures and ensure adequate supervision is always maintained, including during meal times and staff breaks. Responding to feedback from staff about resourcing issues or limitations and taking action to address reasonable concerns. In single educator settings, consideration should be given to how to manage risks inherent to that context.
- For family day care, ensure educators are adequately supported by coordinators and the nominated supervisor as necessary and, in particular, during any higher risk activities or when responding to an incident.
- In all service types, ensure staff are not overburdened with tasks or responsibilities concurrently for duties which are incompatible. This is particularly important for staff responsible for supervising children and staff responsible for transporting children. For example, if a service's transportation policy and procedure requires a second staff member to check the vehicle after children disembark, make sure the service is adequately staffed to ensure this role is, in fact, carried out by someone other than the driver, and that all children remain adequately supervised at all times.
- Ensure adequate equipment, resources and/or forms required to implement specific policies and procedures are available to staff at all times.

### Examples of evidence

- Records of the dates and times staff were participating in training sessions such as training schedules/overview documents, rosters showing times allocated for staff training, time stamps on online modules, approvals for staff training, meeting minutes that include training start and finish times or educator registers listing the training provided.
- Records of monitoring and support visits to FDC educators which show resources were assessed to ensure policies and procedures can be complied with.
- Rosters which include educator roles and records of staff working directly with children as evidence of staffing arrangements at any time education and care is being provided. This could include addressing responsibilities for facilitating policy/procedure updates and training of staff in position descriptions.
- Evidence of discussions about resourcing limitations and actions taken to address any reasonable concerns.
- Receipts of specialised equipment purchases and maintenance schedules if required.