



NQF REVIEW
2019

**SUPPLEMENTARY
INFORMATION ON THE
CHILD SAFE PRINCIPLES
AND THE NQF**

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Chapter 4 – Royal Commission recommendations

4.1 National Principles for Child Safe Organisations

This analysis was undertaken by ACECQA and demonstrates the areas of alignment and potential gaps between the National Quality Framework (NQF) and the National Child Safe Principles.

Key

	Limited alignment between the NQF and National Child Safe Principles
	Partial alignment between the NQF and National Child Safe Principles
	Sound alignment between the NQF and National Child Safe Principles

Principle 1: Child safety and wellbeing is embedded in organisational leadership, governance and culture.

Alignment with NQF objectives:

- Ensure the safety, health and wellbeing of children attending education and care services
- Improve the educational and developmental outcomes for children attending education and care services
- Promote continuous improvement in the provision of quality education and care services.

Alignment with NQF Principles:

- The rights and best interests of the child are paramount
- Best practice is expected in the provision of education and care services.

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>1.1 The organisation makes a public commitment to child safety.</p>	<p>Element 6.1.3 – Families are supported.</p> <p>Element 7.1.1 – Service Philosophy and purpose.</p>	<p>There is no explicit requirement for service providers to make a public commitment to child safety (i.e. to prevent child abuse and neglect). However, in the NQF context, the policy and philosophy that each service is legally required to make available to families is invariably focused on children’s wellbeing and safety.</p> <p>The NQF provides partial alignment with this NCSP key action area although in practice, statements of service philosophy are well aligned.</p>

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>1.2 A child safe culture is championed and modelled at all levels of the organisation from the top down and the bottom up.</p>	<p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • each service to have specified policies and procedures in place¹ • for all staff and volunteers to follow the service’s policies and procedures • that the service’s policies and procedures are to be kept available • The notification of families 14 days before making changes to policies and procedures with significant impact on children and families. <p>Quality Area 2 – Children’s health and safety, especially Element 2.2.1 (Supervision) and Element 2.2.3 (Child protection).</p> <p>Standard 4.1 – Staffing arrangements.</p> <p>Quality Area 7 – Governance and leadership.</p>	<p>Identified elements within Quality Area 2 (Element 2.2.1 – Supervision, and Element 2.2.3 – Child protection) are ‘meeting level’ requirements of the NQS, but there is no explicit focus or organising principle around organisational culture.</p> <p>It is not explicitly stated in Regulation 168 what the child safe environment policy needs to cover off on. It could potentially be interpreted as a requirement that is limited to the physical environment, rather than also addressing notions of a child safe culture.</p> <p>There may be a gap in Standard 4.1 around addressing the suitability of staff (including volunteers), reference checks, in relation to both recruitment processes and leadership and governance. This may be picked up in guidance.</p> <p>Standard 7.2 expects service leadership to build and promote a positive organisational culture and professional learning community.</p> <p>The NQF provides partial alignment with this NCSP key action area.</p>

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>1.3 Governance arrangements facilitate implementation of the child safety and wellbeing policy at all levels.</p>	<p>Section 167 – Creates an offence for failing to protect children from harm and hazard.</p> <p>Section 171 – Exclusion of inappropriate persons from the education and care premises following the direction of the regulatory authority.</p> <p>Section 189 – Emergency removal of children.</p> <p>Regulation 99 – Children leaving the education and care services premises.</p> <p>Regulation 149 – Record keeping requirements relating to volunteers and students.</p> <p>Regulation 165 – Record of visitors at a family day care service.</p> <p>Regulation 166 – Children not to be alone with visitors in an FDC setting.</p> <p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • each service to have specified policies and procedures in place • for all staff and volunteers to follow the service’s policies and procedures • that the service’s policies and procedures are to be kept available • the notification of families 14 days before making changes to policies and procedures with significant impact on children and families. <p>Quality Area 2 – Children’s health and safety, especially Elements 2.2.1 (supervision) and 2.2.3 (child protection).</p> <p>Quality Area 7 – Governance and leadership, especially Element 7.1.2 (management systems).</p>	<p>In assessing practice against Quality Area 7 (Element 7.1.2) regulators seek evidence that service practices are consistent with documented policies and procedures.</p> <p>Several components of Quality Area 7 expect that ‘governance supports the operation of a quality service’, that ‘systems are in place to manage risk’ and there are processes for ‘continuous improvement’ and that ‘(staff) performance is regularly evaluated’.</p> <p>All providers must have responsible and suitably qualified individuals for each service that share legal and governance accountability for quality and compliance.</p> <p>See commentary above under 1.2 for potential gaps in the NQF.</p> <p>The NQF provides partial alignment with this NCSP key action area.</p>

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>1.4 A Code of Conduct provides guidelines for staff and volunteers on expected behavioural standards and responsibilities.</p>	<p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • each service to have specified policies and procedures in place • for all staff and volunteers to follow the service’s policies and procedures • that the service’s policies and procedures are to be kept available • the notification of families 14 days before making changes to policies and procedures with significant impact on children and families. <p>In particular, Regulation 168(2)(h) requires services to have a policy and procedure around providing a child safe environment and Regulation 168(2)(h)(i) requires services to have a policy and procedure around staffing, including a code of conduct for staff members.</p> <p>Standard 4.2 – Professionalism, especially Element 4.2.2 (Professional standards).</p> <p>Element 7.1.3 – Roles and responsibilities.</p>	<p>Collectively, Regulation 168 and the requirements of Standard 4.2 provide a sound alignment with this NCSP key action area for service staff.</p> <p>The Victorian Commission for Children and Young People recommended that codes of conduct should also identify what behaviour is not acceptable between adults and children. This may constitute a gap between this key action area of the NCSP and the NQF.</p>

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>1.5 Risk management strategies focus on preventing, identifying and mitigating risks to children and young people.</p>	<p>Regulations 100, 101, 102 – requirement for service providers to undertake risk assessments prior to excursions.</p> <p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • each service to have specified policies and procedures in place • for all staff and volunteers to follow the service’s policies and procedures • that the service’s policies and procedures are to be kept available • The notification of families 14 days before making changes to policies and procedures with significant impact on children and families. <p>Quality Area 2 – Children’s health and safety, especially Element 2.2.2 (Incident and emergency management) and Element 2.2.3 (Child protection).</p> <p>Quality Area 5 – Relationships with children.</p> <p>Element 7.1.2 – Management systems.</p>	<p>The NQF provides Sound alignment with this NCSP key action area.</p> <p>The National Regulations set a requirement for services to undertake risk assessments prior to excursions, and through Element 7.1.2, the NQF sets appropriate minimum requirements for child-focused risk management in line with NCSP 1.5. Further, the <i>Guide to the NQF</i> emphasises the importance of risk identification and mitigation across all aspects of the provision of education and care services.</p> <p>However, it may also be argued that this key action area is not aligned, as it points to a different kind of risk, especially in the OSHC space where there is a higher risk with the interaction of children and young people. This may need to be addressed through further guidance for risk assessments.</p>

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>1.6 Staff and volunteers understand their obligations on information sharing and recordkeeping.</p>	<p>Section 162A – requires persons in day-to-day charge and nominated supervisors to have child protection training.</p> <p>Regulation 84 – requires the approved provider of an education and care to ensure that nominated supervisors and staff members who work with children to be aware of the existence, application and any obligations they might have under current child protection law.</p> <p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • each service to have specified policies and procedures in place • for all staff and volunteers to follow the service’s policies and procedures • that the service’s policies and procedures are to be kept available • the notification of families 14 days before making changes to policies and procedures with significant impact on children and families. <p>Quality Area 7 – Governance and leadership, especially Element 7.1.2 (Management Systems).</p>	<p>The NQF provides a sound alignment with this NCSP key action area for service staff.</p>

Principle 2: Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.

Alignment with NQF objectives:

- Ensure the safety, health and wellbeing of children attending education and care services.
- Improve the educational and developmental outcomes for children attending education and care services.

Alignment with NQF Principles:

- The rights and best interests of the child are paramount.
- Best practice is expected in the provision of education and care services.

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>2.1 Children and young people are informed about all of their rights, including to safety, information, and participation.</p>	<p>Quality Area 1 – Educational program and practice, especially Standard 1.1 (Program) and Standard 1.2 (Practice).</p> <p>Element 5.1.2 – Dignity and rights of the child.</p>	<p>The NQF provides partial alignment with this NCSP key action area.</p> <p>While Element 5.1.2 sets an expectation that services will maintain the dignity and rights of each child, there is no explicit requirement that children be informed of their rights, commensurate to their age noting that children attending education and care services can range from birth to 12 years of age.</p>
<p>2.2 The importance of friendships is recognised and support from peers is encouraged, to help children and young people feel safe and be less isolated.</p>	<p>Quality Area 1 – Education program and practice, Especially Standard 1.1 (Program) and Standard 1.2 (Practice).</p> <p>Standard 5.2 – Relationships between children.</p>	<p>The NQF sets appropriate minimum requirements for child-focused risk management in line with NCSP 2.2.</p> <p>The NQF presents sound alignment with this NCSP key action area.</p>

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>2.3 Where relevant to the setting or context, children may be offered access to sexual abuse prevention programs and to relevant related information in an age appropriate way.</p>	<p>Section 162A – requires persons in day-to-day charge and nominated supervisors to have child protection training.</p> <p>Regulation 84 – requires the approved provider of an education and care service to ensure that nominated supervisors and staff members who work with children to be aware of the existence, application and any obligations they might have under current child protection law.</p> <p>Standard 5.1 – Relationships between educators and children.</p>	<p>The NQF presents limited alignment with this NCSP key action area.</p> <p>The NQF does not include any specific reference to provision of access to sexual abuse prevention programs and to relevant related information in an age appropriate way.</p>
<p>2.4 Staff and volunteers are attuned to signs of harm and facilitate child friendly ways for children to express their views, participate in decision making and raise their concerns.</p>	<p>Section 162A – requires persons in day-to-day charge and nominated supervisors to have child protection training.</p> <p>Regulation 84 – requires the approved provider of an education and care service to ensure that nominated supervisors and staff members who work with children to be aware of the existence, application and any obligations they might have under current child protection law.</p> <p>Element 2.2.3 – Child protection</p> <p>Standard 5.1 – Relationships between educators and children.</p> <p>Quality Area 7 – Governance and leadership, Element 7.1.2 (Management systems), Element 7.1.3 (Roles and responsibilities) and Element 7.2.3 (Development of professionals).</p>	<p>The NQF provides a partial alignment around this NCSP key action area for service staff.</p> <p>However, the components of the NQF do not extend to volunteers.</p>

Principle 3: Families and communities are informed, and involved in promoting child safety and wellbeing.

Alignment with NQF objectives:

- Ensure the safety, health and wellbeing of children attending education and care services.
- Improve the educational and developmental outcomes for children attending education and care services.

Alignment with NQF Principles:

- The rights and best interests of the child are paramount.
- The role of families is respected and supported.
- Best practice is expected in the provision of education and care services.

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>3.1 Families participate in decisions affecting their child.</p>	<p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • each service to have specified policies and procedures in place • for all staff and volunteers to follow the service’s policies and procedures • that the service’s policies and procedures are to be kept available • the notification of families 14 days before making changes to policies and procedures with significant impact on children and families. <p>In particular, Regulation 172 requires families to be notified at least 14 days before a change to a policy that impacts on the service’s provision of education and care to any child enrolled, or the family’s ability to use the service.</p> <p>Standard 6.1 – Supportive relationships with families.</p>	<p>The NQF provides a sound alignment with this NCSP key action area.</p>

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>3.2 The organisation engages and openly communicates with families and the community about its child safe approach and relevant information is accessible.</p>	<p>Element 1.3.3 – Information for families.</p> <p>Standard 6.1 – Supportive relationships with families.</p>	<p>The NQS sets broad requirements that services engage with families around issues and decisions affecting their children and around their developmental and educational progress. The national regulations also require families to be informed of policy changes that affect them.</p> <p>There are no current requirements specific to a service’s child safe approach about family engagement, except for the obligation to share information and engage with families on all aspects of the service’s education and care of children.</p>

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>3.3 Families and communities have a say in the development and review of the organisation's policies and practices.</p>	<p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • each service to have specified policies and procedures in place • for all staff and volunteers to follow the service's policies and procedures • that the service's policies and procedures are to be kept available • the notification of families 14 days before making changes to policies and procedures with significant impact on children and families. <p>In particular, Regulation 172 requires families to be notified at least 14 days before a change to a policy that impacts on the service's provision of education and care to any child enrolled, or the family's ability to use the service.</p> <p>Standard 6.1 – supportive relationships with families.</p> <p>Standard 7.1 – Governance, especially Element 7.1.1 (Service philosophy and purpose) and Element 7.1.2 (Management systems).</p>	<p>The NQF appears to provide a sound alignment with this NCSP key action area.</p>
<p>3.4 Parents, caregivers and the community are informed about the organisation's operations and governance.</p>	<p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • each service to have specified policies and procedures in place • for all staff and volunteers to follow the service's policies and procedures • that the service's policies and procedures are to be kept available • the notification of families 14 days before making changes to policies and procedures with significant impact on children and families. <p>In particular, Regulation 172 requires families to be notified at least 14 days before a change to a policy that impacts on the service's provision of education and care to any child enrolled, or the family's ability to use the service.</p> <p>Standard 7.1 – Governance.</p> <p>Standard 6.1 – Supportive relationships with families.</p>	<p>The NQF appears to provide a sound alignment with this NCSP key action area.</p>

Principle 4: Equity is upheld and diverse needs respected in policy and practice.

Alignment with NQF objectives:

- Ensure the safety, health and wellbeing of children attending education and care services.
- Improve the educational and developmental outcomes for children attending education and care services.

Alignment with NQF Principles:

- The rights and best interests of the child are paramount.
- Children are successful, competent and capable learners.
- Equity inclusion and diversity underpin the framework.
- Australia's Aboriginal and Torres Strait Islander cultures are values.
- The role of families is respected and supported.
- Best practice is expected in the provision of education and care services.

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
4.1 The organisation, including staff and volunteers, understands children and young people's diverse circumstances, and provides support and responds to those who are vulnerable.	<p>Quality Area 1 – Educational program and practice, especially Standard 1.1 (Program), Element 1.2.2 (Responsive teaching and scaffolding), Element 1.2.3 (Child directed learning), Element 1.3.1 (Assessment and planning cycle) and Element 1.3.2 (Critical reflection).</p> <p>Quality Area 2 – Children's health and safety, especially Element 2.2.3 (child protection).</p> <p>Quality Area 4 – Staffing arrangements, especially Standard 4.1 – staffing arrangements.</p> <p>Quality Area 5 – Relationships with children, especially Standard 5.1 (Relationships between educators and children).</p> <p>Quality Area 6 – Collaborative partnerships with families and communities, especially Standard 6.1 (Supportive relationships with families).</p> <p>Quality Area 7 – Governance and leadership, especially Element 7.1.2 (Management systems).</p>	<p>While there is some alignment with the NQF, there may be a more proactive component of this NCSP in relation to access and support for vulnerable children and young people.</p> <p>It is noted that government funded programs currently exist outside the NQF to achieve aims that align with this NCSP, including the Australian Government's Inclusion Support Program. Service providers must also comply with relevant disability anti-discrimination legislation.</p> <p>In addition, the identified components of the NQS do not explicitly extend to volunteers.</p> <p>There is partial alignment between this NCSP key action area and the NQF.</p>

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>4.2 Children and young people have access to information, support and complaints processes in ways that are culturally safe, accessible and easy to understand.</p>	<p>Regulation 155 – Interactions with children.</p> <p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • each service to have specified policies and procedures in place • for all staff and volunteers to follow the service’s policies and procedures • that the service’s policies and procedures are to be kept available • the notification of families 14 days before making changes to policies and procedures with significant impact on children and families. <p>In particular, Regulation 168 requires services to have a complaints-handling policy and procedure.</p> <p>Quality Area 1 – Program and practice – especially Element 1.1.1 (Approved learning framework), Element 1.1.2 (Child-centred), Element 1.3.1 (Assessment and planning cycle).</p> <p>Quality Area 5 – Relationships with children especially Standard 5.1 (Relationships between educators and children).</p> <p>Quality Area 7 – Governance and leadership especially Element 7.1.2 (Management systems).</p>	<p>While there is broad alignment with the NQF, there is no specific requirement for information, support and complaints processes to be accessible to children, or culturally safe. There is considered to be partial alignment of the NQF with this NCSP key action area.</p>

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>4.3 The organisation pays particular attention to the needs of Aboriginal and Torres Strait Islander children, children with disability, children from culturally and linguistically diverse backgrounds, those who are unable to live at home, and lesbian, gay, bisexual, transgender and intersex children and young people.</p>	<p>Quality Area 1 – Program and practice, especially Standard 1.1 (Program), Element 1.2.2 (Responsive teaching and scaffolding), Element 1.2.3 (Child-directed learning), Element 1.3.1 (Assessment and planning cycle) and Element 1.3.2 (Critical reflection).</p> <p>Quality Area 5 – Relationships with children, especially Standard 5.1 (relationships between educators and children).</p> <p>Quality Area 6 – Collaborative partnerships with families and communities, especially Standard 6.1 (Supportive relationships with families).</p>	<p>The NQF is embedded with the intentionality and mechanisms to support achieving the majority of this outcome, but does not specifically acknowledge or reference the unique needs of children unable to live at home or LGBTIQ+ children or young people. All references in guidance (and the ALFs) refer to inclusion in the context of diversity/ vulnerability and typically refer to disability, CALD and Aboriginal and Torres Strait Islander children, but there is limited specific reference or framing in relation to the specific needs of children unable to live at home or LGBTIQ+ children.</p> <p>There is partial alignment between the NQF and this key action area of the NCSP.</p>

Principle 5: People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.

Alignment with NQF objectives:

- Ensure the safety, health and wellbeing of children attending education and care services.
- Improve the educational and developmental outcomes for children attending education and care services.
- Promote continuous improvement in the provision of quality education and care services.

Alignment with NQF Principles:

- The rights and best interests of the child are paramount.
- Best practice is expected in the provision of education and care services.

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>5.1 Recruitment, including advertising, referee checks and staff and volunteer pre-employment screening, emphasise child safety and wellbeing.</p>	<p>Section 12 – Applicant for provider approval must be a fit and proper person.</p> <p>Section 13 – Matters to be taken into consideration when assessing fitness and propriety.</p> <p>Section 21 – Reassessment of fitness and propriety.</p> <p>Regulation 16 – Matters relating to criminal history to which the regulatory authority must have regard when making assessments under s 13.</p> <p>Regulation 147 – Sets out information required to be recorded on a staff record including teacher registration and WWCC/WWVP.</p> <p>Element 2.2.3 – Child protection.</p> <p>Quality Area 7 – Governance and leadership, especially Standard 7.1 (Governance).</p>	<p>While there is some broad alignment with the NQF, the specificity within this NCSP around recruitment practices may need to be enhanced in the NQF. There is considered to be partial alignment between the NQF and this key action area of the NCSP.</p> <p>In addition, the identified components of the NQF do not explicitly extend to volunteers.</p>

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>5.2 Relevant staff and volunteers have current working with children checks or equivalent background checks.</p>	<p>Section 163 – Fit and proper person.</p> <p>Regulation 147 – Sets out information required to be recorded on a staff record including teacher registration and WWCC/WWVP.</p> <p>Regulation 164 – Requirement for notice of new persons at an FDC residence.</p> <p>Regulation 165 – Requirement for record of visitors to be maintained at an FDC service.</p> <p>Regulation 166 – Children not to be left alone with visitors.</p> <p>Element 2.2.3 – Child protection.</p> <p>Quality Area 7 – Governance and leadership.</p>	<p>The NQF appears to provide a sound alignment with this NCSP key action area.</p> <p>However, the identified components of the NQF may not extend explicitly to volunteers.</p>

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>5.3 All staff and volunteers receive an appropriate induction and are aware of their responsibilities to children and young people, including record keeping, information sharing and reporting obligations</p>	<p>Section 162A – requires persons in day-to-day charge and nominated supervisors to have child protection training.</p> <p>Regulation 84 – requires the approved provider of an education and care service to ensure that nominated supervisors and staff members who work with children to be aware of the existence, application and any obligations they might have under current child protection law.</p> <p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • each service to have specified policies and procedures in place • for all staff and volunteers to follow the service’s policies and procedures • that the service’s policies and procedures are to be kept available • the notification of families 14 days before making changes to policies and procedures with significant impact on children and families. <p>In particular, Regulation 168 requires services to have a policy and procedure around the participation of volunteers.</p> <p>Quality Area 7 – Governance and leadership, especially Standard 7.1 (Governance).</p>	<p>While there is some partial alignment with the NQF, the specificity within this NCSP around induction may need to be enhanced in the NQF.</p> <p>In addition, Regulation 84 does not extend to volunteers.</p>
<p>5.4 Ongoing supervision and people management is focused on child safety and wellbeing.</p>	<p>Section 165 – Offence to inadequately supervise children.</p> <p>Section 167 – Offence relating to protection of children from harm and hazards.</p> <p>Standard 2.2 – Safety.</p> <p>Quality Area 4 – Staffing arrangements, especially Standard 4.2 (Professionalism).</p> <p>Quality Area 7 – Governance and leadership, especially Elements 7.1.2 (Management systems), Element 7.1.3 (Roles and responsibilities) and Element 7.2.3 (Development of professionals).</p>	<p>The NQF appears to provide a sound alignment with this NCSP key action area.</p>

Principle 6: Processes to respond to complaints and concerns are child focussed.

Alignment with NQF objectives:

- Ensure the safety, health and wellbeing of children attending education and care services.
- Improve the educational and developmental outcomes for children attending education and care services.
- Promote continuous improvement in the provision of quality education and care services.

Alignment with NQF Principles:

- The rights and best interests of the child are paramount.
- Children are successful, competent and capable learners.
- Best practice is expected in the provision of education and care services.

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>6.1 The organisation has an accessible, child focused complaint handling policy which clearly outlines the roles and responsibilities of leadership, staff and volunteers, approaches to dealing with different types of complaints, breaches of relevant policies or the Code of Conduct and obligations to act and report.</p>	<p>Section 174(2)(a)&(b) – requires the approved provider to notify the regulatory authority of any serious incident or complaints that the safety, health or wellbeing of a child or children at that service is compromised while they are attending that service.</p> <p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • each service to have specified policies and procedures in place • for all staff and volunteers to follow the service’s policies and procedures • that the service’s policies and procedures are to be kept available • the notification of families 14 days before making changes to policies and procedures with significant impact on children and families. 	<p>6.1 While there is some broad alignment with the NQF, the specificity within this NCSP – particularly in relation to ‘child focussed complaints handling’ – may need to be enhanced in the NQF.</p> <p>The NQF is considered to have partial alignment with this key action area of the NCSP.</p>
<p>6.2 Effective complaint handling processes are understood by children and young people, families, staff and volunteers, and are culturally safe.</p>	<p>In particular, Regulation 168 requires a complaints handling policy and procedure to be in place in the service.</p> <p>Regulation 173(2)(b) requires approved providers to make visible from the main entrance the name and contact number of the person to whom complaints may be made.</p> <p>Regulation 176(2)(b) Requires notifications made under Section 174(2)(b) to be made within 24 hours of the incident.</p>	<p>6.2 While there is some broad alignment with the NQF, the specificity within this NCSP – particularly in relation to complaint handling processes being ‘understood by children and young people’ – may need to be enhanced in the NQF.</p>

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
	<p>Quality Area 5 – Relationships with children, especially Element 5.1.2 (Dignity and rights of the child) and Element 5.2.2 (Self-regulation).</p> <p>Standard 6.1 – especially elements 6.1.1 and 6.1.2.</p>	<p>The NQF is considered to have partial alignment with this key action area of the NCSP.</p>
<p>6.3 Complaints are taken seriously, and responded to promptly and thoroughly.</p>	<p>Quality Area 7 – Governance and leadership, especially Element 7.1.2 (Management systems) and Element 7.1.3 (Roles and responsibilities).</p>	<p>6.3 There appears to be sound alignment with this NCSP key action area.</p>
<p>6.4 The organisation has policies and procedures in place that address reporting of complaints and concerns to relevant authorities, whether or not the law requires reporting, and co-operates with law enforcement.</p>		<p>6.4 There appears to be sound alignment with this NCSP key action area.</p>
<p>6.5 Reporting, privacy and employment law obligations are met.</p>		<p>6.5 These obligations exist and are set outside of the jurisdiction of the NQF:</p> <ul style="list-style-type: none"> • The Commonwealth Privacy Act applies to education and care service providers. • The Fair Work Act applies to education and care service providers. • Child protection reporting obligations are set in each jurisdiction.

Principle 7: Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.

Alignment with NQF objectives:

- Ensure the safety, health and wellbeing of children attending education and care services.
- Improve the educational and developmental outcomes for children attending education and care services.
- Promote continuous improvement in the provision of quality education and care services.

Alignment with NQF Principles:

- The rights and best interests of the child are paramount.
- Best practice is expected in the provision of education and care services.

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>7.1 Staff and volunteers are trained and supported to effectively implement the organisation’s child safety and wellbeing policy.</p>	<p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • Each service to have specified policies and procedures in place • for all staff and volunteers to follow the service’s policies and procedures • that the service’s policies and procedures are to be kept available • The notification of families 14 days before making changes to policies and procedures with significant impact on children and families. <p>In particular, Regulation 170 requires an approved provider to take reasonable steps to ensure that all staff and persons associated with the delivery of education and care at an education and care service follow policies and procedures.</p> <p>Quality Area 4 – Staffing arrangements, especially Standard 4.2 (Professionalism).</p> <p>Quality Area 7 – Governance and leadership, especially Element 7.1.3 (Roles and responsibilities), Element 7.2.1 (Continuous improvement) and Element 7.2.3 (Development of professionals).</p>	<p>The NQF is considered to have sound alignment with this key action area of the NCSP.</p> <p>While there is some broad alignment with the NQF, the specificity within this NCSP around the need for a child safety and wellbeing policy may need to be enhanced in the NQF.</p>

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>7.2 Staff and volunteers receive training and information to recognise indicators of child harm including harm caused by other children and young people.</p>	<p>Section 162A – requires persons in day-to-day charge and nominated supervisors to have child protection training.</p> <p>Regulation 84 – requires the approved provider of an education and care service to ensure that nominated supervisors and staff members who work with children to be aware of the existence, application and any obligations they might have under current child protection law.</p> <p>Quality Area 4 – Staffing arrangements, especially Standard 4.2 (Professionalism).</p> <p>Quality Area 7 – Governance and leadership, especially Element 7.2.1 (Continuous improvement) and Element 7.2.3 (development of professionals).</p>	<p>While there is some broad alignment with the NQF, the specificity within this NCSP around training and information to recognise indicators of child harm – including harm caused by other children and young people – may need to be enhanced in the NQF.</p> <p>In addition, Regulation 84 does not extend to volunteers.</p> <p>The NQF is considered to have partial alignment with this key action area of the NCSP.</p>
<p>7.3 Staff and volunteers receive training and information to respond effectively to issues of child safety and wellbeing and support colleagues who disclose harm.</p>	<p>Section 162A – requires persons in day-to-day charge and nominated supervisors to have child protection training.</p> <p>Regulation 84 – requires the approved provider of an education and care service to ensure that nominated supervisors and staff members who work with children to be aware of the existence, application and any obligations they might have under current child protection law.</p> <p>Quality Area 2 – Children’s health and safety, especially Element 2.2.3 (Child protection).</p> <p>Quality Area 4 – Staffing arrangements, especially Standard 4.2 (Professionalism).</p> <p>Quality Area 7 – Governance and leadership, especially Element 7.1.2 (Management systems).</p>	<p>While there is some broad alignment with the NQF, the specificity within this NCSP around training and information to respond effectively to issues of child safety and wellbeing and support colleagues who disclose harm may need to be enhanced in the NQF.</p> <p>In addition, Regulation 84 does not extend to volunteers.</p> <p>The NQF is considered to have partial alignment with this key action area of the NCSP.</p>

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>7.4 Staff and volunteers receive training and information on how to build culturally safe environments for children and young people.</p>	<p>Quality Area 2 – Children’s Health and Safety, especially Element 2.2.3 (Child protection).</p> <p>Quality Area 4 – Staffing Arrangements, especially Standard 4.2 (Professionalism).</p> <p>Quality Area 7 – Governance and Leadership, especially Element 7.1.2 (Management Systems).</p>	<p>While there is some broad alignment with the NQF, the specificity within this NCSP around training and information to build culturally safe environments for children and young people may need to be enhanced in the NQF.</p> <p>There may be some additional guidance required here, as the term ‘culturally safe environment’ may not be immediately interpreted at the level required to fully meet the intent. Potentially, it could be interpreted in various ways.</p> <p>The NQF is considered to have partial alignment with this key action area of the NCSP.</p>

Principle 8: Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.

Alignment with NQF objectives:

- Ensure the safety, health and wellbeing of children attending education and care services.
- Improve the educational and developmental outcomes for children attending education and care services.
- Promote continuous improvement in the provision of quality education and care services.

Alignment with NQF Principles:

- The rights and best interests of the child are paramount.
- Children are successful, competent and capable learners.
- Best practice is expected in the provision of education and care services.

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>8.1 Staff and volunteers identify and mitigate risks in the online and physical environments without compromising a child's right to privacy, access to information, social connections and learning opportunities.</p>	<p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • each service to have specified policies and procedures in place • for all staff and volunteers to follow the service's policies and procedures • that the service's policies and procedures are to be kept available • the notification of families 14 days before making changes to policies and procedures with significant impact on children and families. <p>In particular, Regulation 168 requires services to have a policy and procedure around providing a child safe environment and for a policy around volunteers.</p> <p>Quality Area 1 – Program and practice, especially Element 1.1.3 (Program learning opportunities) and Element 1.2.3 (Child-directed learning).</p> <p>Quality Area 2 – Children's health and safety, especially Standard 2.2 (Safety).</p> <p>Quality Area 3 – Physical environment.</p> <p>Quality Area 4 – Staffing arrangements.</p> <p>Quality Area 5 – Relationships with children, especially Standard 5.1 (Relationships between educators and children).</p> <p>Quality Area 7 – Governance and leadership, especially Element 7.1.2 (Management systems) and Element 7.1.3 (Roles and responsibilities).</p>	<p>While there is some broad alignment with the NQF, the specificity within this NCSP around training and information in relation to identifying and mitigating risks – notably in relation to the online environment – may need to be enhanced in the NQF.</p> <p>The NQF is considered to have partial alignment with this key action area of the NCSP.</p>

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>8.2 The online environment is used in accordance with the organisation's Code of Conduct and child safety and wellbeing policy and practices.</p>	<p>N/A</p>	<p>The NQF does not address the use of the online environment in accordance with an organisation's Code of Conduct and child safety and wellbeing policy and practices.</p> <p>The NQF is considered to have limited alignment with this key action area of the NCSP.</p>
<p>8.3 Risk management plans consider risks posed by organisational settings, activities, and the physical environment.</p>	<p>Regulations 100, 101, 102 – requirement service providers to undertake risk assessments prior to excursions.</p> <p>Quality Area 2 – Children's health and safety, especially Element 2.2.1 (Supervision), Element 2.2.2 (Incident and emergency management) and Element 2.2.3 (Child protection).</p> <p>Quality Area 7 – Governance and leadership, especially Standard 7.1 (Governance).</p>	<p>The NQF appears to provide a sound alignment with this NCSP key action area.</p>

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>8.4 Organisations that contract facilities and services from third parties have procurement policies that ensure the safety of children and young people.</p>	<p>Section 18 – Effect of provider approval.</p> <p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • each service to have specified policies and procedures in place • for all staff and volunteers to follow the service’s policies and procedures • that the service’s policies and procedures are to be kept available • the notification of families 14 days before making changes to policies and procedures with significant impact on children and families. <p>Element 7.1.2 – Management systems.</p>	<p>The NQF is considered to have sound alignment with this key action area of the NCSP.</p> <p>Once granted, provider approval establishes the provider as the primary duty holder under the Education and Care Services National Law, including rendering them responsible for the impact of any contracted services they may supply to children.</p> <p>Provider and services approvals also require each service to have a policy in place for determining the responsible person present at the service, and Element 7.1.2 sets an expectation that services will have systems in place to manage risk and enable the effective management and operation of a quality service.</p>

Principle 9: Implementation of the national child safe principles is regularly reviewed and improved.

- Alignment with NQF objectives:
- Ensure the safety, health and wellbeing of children attending education and care services.
- Improve the educational and developmental outcomes for children attending education and care services.
- Promote continuous improvement in the provision of quality education and care services.

Alignment with NQF Principles:

- The rights and best interests of the child are paramount.
- Best practice is expected in the provision of education and care services.

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>9.1 The organisation regularly reviews, evaluates and improves child safe practices.</p>	<p>Element 7.1.2 – Management systems.</p> <p>Element 7.2.1 – Continuous improvement.</p>	<p>While there is some broad alignment with the NQF, the specificity within this NCSP in relation to reviewing, evaluating and improving child safe practices may need to be enhanced in the NQF.</p> <p>The NQF is considered to have partial alignment with this key action area of the NCSP.</p>

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
<p>9.2 Complaints, concerns and safety incidents are analysed to identify causes and systemic failures so as to inform continuous improvement.</p>	<p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • each service to have specified policies and procedures in place. • for all staff and volunteers to follow the service’s policies and procedures. • that the service’s policies and procedures are to be kept available. • the notification of families 14 days before making changes to policies and procedures with significant impact on children and families. <p>In particular, Regulation 168 requires services to have a complaints handling policy and procedure in place.</p> <p>Element 2.2.2 – Incident and emergency management.</p> <p>Quality Area 7 – Governance and leadership, especially Elements 7.1.2 (management systems) and Element 7.2.1 (continuous improvement).</p>	<p>The NQF appears to provide a sound alignment with this NCSP key action area.</p>
<p>9.3 The organisation reports on the findings of relevant reviews to staff and volunteers, community and families and children and young people.</p>	<p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • each service to have specified policies and procedures in place • for all staff and volunteers to follow the service’s policies and procedures • that the service’s policies and procedures are to be kept available • the notification of families 14 days before making changes to policies and procedures with significant impact on children and families. <p>In particular, Regulation 172 requires families to be notified of significant policy changes.</p> <p>Quality Area 6 – Collaborative partnerships with families and communities, especially Element 6.1.1 (engagement with the service).</p> <p>Quality Area 7 – Governance and Leadership.</p>	<p>While there is some broad alignment with the NQF, the specificity within this NCSP in relation to reporting on findings of relevant reviews to staff and volunteers, community and families and children and young people may need to be enhanced in the NQF.</p> <p>The NQF is considered to have partial alignment with this key action area of the NCSP.</p>

Principle 10: Policies and procedures document how the organisation is safe for children and young people.

Alignment with NQF objectives:

- Ensure the safety, health and wellbeing of children attending education and care services.
- Improve the educational and developmental outcomes for children attending education and care services.
- Promote continuous improvement in the provision of quality education and care services.

Alignment with NQF Principles:

- The rights and best interests of the child are paramount.
- Best practice is expected in the provision of education and care services.

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
10.1 Policies and procedures address all national child safe principles.	<p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • each service to have specified policies and procedures in place • for all staff and volunteers to follow the service’s policies and procedures • that the service’s policies and procedures are to be kept available • the notification of families 14 days before making changes to policies and procedures with significant impact on children and families. 	Not currently required.
10.2 Policies and procedures are documented and easy to understand.	<p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • each service to have specified policies and procedures in place • for all staff and volunteers to follow the service’s policies and procedures • that the service’s policies and procedures are to be kept available • the notification of families 14 days before making changes to policies and procedures with significant impact on children and families. 	The NQF appears to provide a sound alignment with this NCSP key action area.

Key action areas for this National Child Safe Principle	Alignment with the NQF	Potential gaps in the NQF
10.3 Best practice models and stakeholder consultation informs the development of policies and procedures.	<p>Quality Area 6 – Collaborative partnerships with families and communities.</p> <p>Quality Area 7 – Governance and Leadership, especially Element 7.1.1 (Service philosophy and purpose) and Element 7.1.2 (Management systems).</p>	The NQF appears to provide a sound alignment with this NCSP key action area.
10.4 Leaders champion and model compliance with policies and procedures.	<p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • Each service to have specified policies and procedures in place • for all staff and volunteers to follow the service’s policies and procedures • that the service’s policies and procedures are to be kept available • The notification of families 14 days before making changes to policies and procedures with significant impact on children and families. <p>In particular, Regulation 170 requires that the approved provider takes reasonable steps to ensure that policies and procedures are followed.</p> <p>Quality Area 2 – Children’s health and safety, especially Standard 2.2 (Safety).</p> <p>Quality Area 7 – Governance and leadership, especially Element 7.2.2 (Educational Leadership).</p>	The NQF appears to provide a sound alignment with this NCSP key action area.
10.5 Staff and volunteers understand and implement policies and procedures.	<p>Regulations 168–172, which require:</p> <ul style="list-style-type: none"> • each service to have specified policies and procedures in place • for all staff and volunteers to follow the service’s policies and procedures • that the service’s policies and procedures are to be kept available • the notification of families 14 days before making changes to policies and procedures with significant impact on children and families. <p>In particular, Regulation 170 requires that the approved provider takes reasonable steps to ensure that policies and procedures are followed by staff and volunteers.</p>	The NQF appears to provide a sound alignment around this NCSP key action area.

NOTES

- 1 National Regulations, Regulation 168(2) requires services to have policies and procedures in relation to:
 - Health and safety, including matters in relating to:
 - Nutrition, food and beverages, dietary requirements
 - Sun protection
 - Water safety, including safety during any water-based activities
 - The administration of first aid
 - Sleep and rest for children
 - Incident, injury, trauma and illness procedures complying with National Regulations, Regulation 85
 - Dealing with infectious diseases, including procedures complying with National Regulations, reg 88
 - Dealing with medical conditions in children, including the matters set out in National Regulations, Regulation 90
 - Emergency and evacuation, including the matters set out in National Regulations, Regulation 97
 - Delivery of children to, and collection of children from, education and care service premises, including procedures complying with National Regulations, Regulation 99
 - Excursions, including complying with Regulations 100 to 102
 - Providing a child safe environment
 - Staffing, including
 - A code of conduct for staff members
 - Determining the responsible person present at the service
 - The participation of volunteers and students on practicum placements
 - Interactions with children, including the matters set out in Regulations 155 and 156
 - Enrolment and orientation
 - Governance and management of the service, including confidentiality of records
 - The acceptance and refusal of authorisations
 - Payment of fees and provision of a statement of fees charged by the education and care service
 - Dealing with complaints