



# Child Safety, Wellbeing and Service Delivery Policy

Supervised contact visits, supervised changeovers, observational reporting and related child-focused services across Victoria

| Document control       | Details                                                                                                                       |
|------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| Policy owner           | Director / Head of Wrenwood Family Services                                                                                   |
| Child Safety Officer   | Please contact Wrenwood Family Services                                                                                       |
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| Approved by            | Clare Anderson                                                                                                                |
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Wrenwood must also monitor the Commonwealth Children's Contact Services accreditation framework and obtain all required business and practitioner accreditation before any mandatory accreditation rules take effect.

## Our child-safe commitment

Wrenwood Family Services is committed to the safety, participation, wellbeing and dignity of every child and young person who uses, visits or is affected by our services. The best interests and safety of the child guide every decision. Child abuse, grooming, neglect, family violence, racism, discrimination, exploitation and other harm are not tolerated.

Wrenwood listens to children, takes their views seriously and acts promptly when a concern is raised. No concern will be ignored because it is difficult, disputed, inconvenient or harmful to the reputation or interests of Wrenwood or any adult.

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## 1. Purpose

This policy explains how Wrenwood Family Services (Wrenwood) prevents, identifies, responds to and reports child-safety and wellbeing risks while delivering supervised family services. It sets mandatory expectations for governance, recruitment, screening, professional conduct, intake, risk assessment, supervision, complaints, reporting, privacy, records, training and continuous improvement.

It also states the service conditions that allow Wrenwood to provide supervised contact, supervised changeovers and observational reporting in a neutral, structured and child-focused way.

## 2. Scope

This policy applies to:

- all directors, employees, supervisors, contractors, consultants, agency workers, students and volunteers engaged by Wrenwood;
- all supervised contact visits, supervised changeovers, familiarisation sessions, online contact, transport and other child-related services accepted by Wrenwood;
- all physical, community, home, vehicle and online environments used for Wrenwood services; and
- all children and young people under 18 years of age who participate in, attend or are affected by a Wrenwood service.

Parents, carers, family members, support people, referrers and visitors must also comply with Wrenwood's Service Agreement, Participant and Attendee Conduct Rules and all reasonable child-safety directions given by a supervisor.

## 3. Legal and regulatory framework

Wrenwood will operate consistently with applicable Victorian and Commonwealth law, lawful court orders and regulator requirements. The principal framework includes, as applicable:

- Child Wellbeing and Safety Act 2005 (Vic), including the Victorian Child Safe Standards and, where Wrenwood is within scope, the Reportable Conduct Scheme;
- Children, Youth and Families Act 2005 (Vic), including mandatory reporting obligations that apply to prescribed mandatory reporters and the ability of any person to make a child-protection report;
- Crimes Act 1958 (Vic), including failure-to-disclose and failure-to-protect offences;
- Worker Screening Act 2020 (Vic) and Working with Children Check requirements;
- Health Records Act 2001 (Vic) and the Health Privacy Principles for health information handled in Victoria;
- Privacy Act 1988 (Cth) and the Australian Privacy Principles where Wrenwood is an APP entity, together with any applicable data-breach obligations;
- Family Law Act 1975 (Cth), including the statutory framework for Children's Contact Services and any Accreditation Rules that commence under that framework;
- Family Violence Protection Act 2008 (Vic) where relevant to intervention orders, family-violence risk and safe service delivery; and
- all parenting orders, intervention orders, injunctions, safety plans and other lawful directions relevant to the matter.

**LEGAL DUTIES ARE PERSONAL AND CANNOT BE DELEGATED**

An internal report to Wrenwood does not replace a worker's personal duty to contact Victoria Police, DFFH Child Protection or another authority where the law requires that worker to report. A worker must make any legally required external report even if another person says they will do it.

Where there is uncertainty about a reporting threshold, safety takes priority. The worker must obtain immediate direction from the Child Safety Officer or Director without delaying urgent external action.

## 4. Definitions

| Term                       | Meaning                                                                                                                                                                                                                                                                                                        |
|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Child or young person      | A person under 18 years of age.                                                                                                                                                                                                                                                                                |
| Child abuse or harm        | Includes physical violence, sexual abuse or sexual misconduct, grooming, serious emotional or psychological harm, significant neglect, exposure to family violence, racism, discrimination, exploitation and conduct that places a child at unacceptable risk.                                                 |
| Child-safety concern       | Any disclosure, allegation, suspicion, observation, complaint, boundary breach, incident, near miss or risk relating to a child's safety or wellbeing.                                                                                                                                                         |
| Worker                     | Any director, employee, supervisor, contractor, consultant, volunteer, student or other person engaged to perform work for Wrenwood.                                                                                                                                                                           |
| Supervisor                 | The Wrenwood worker assigned to supervise, observe or facilitate a service.                                                                                                                                                                                                                                    |
| Participant                | A parent, carer, family member or other person approved to take part in a Wrenwood service.                                                                                                                                                                                                                    |
| Children's Contact Service | A service falling within the definition in the Family Law Act 1975 (Cth), including professional or commercial facilitation of contact where family members may not safely manage that contact, such as supervised time or supervised changeovers.                                                             |
| Head of Organisation       | The person legally responsible for Reportable Conduct Scheme notifications if that Scheme applies to Wrenwood.                                                                                                                                                                                                 |
| Observational report       | A factual, contemporaneous record of relevant events, conduct, statements and interactions observed during the service. It is not an expert family report, psychological assessment or parenting-capacity opinion unless Wrenwood has been separately and lawfully engaged and qualified to provide such work. |

## 5. Commitments under the Victorian Child Safe Standards

Wrenwood implements all 11 Victorian Child Safe Standards. The following outcomes apply across governance and daily practice:

| Standard                             | Wrenwood commitment                                                                                                                          |
|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| 1 - Aboriginal cultural safety       | Aboriginal children can express their culture and identity. Racism is identified, challenged and addressed.                                  |
| 2 - Leadership and governance        | Child safety is embedded in decision-making, risk management, supervision, accountability and organisational culture.                        |
| 3 - Child participation              | Children are informed about their rights, heard in age-appropriate ways and taken seriously.                                                 |
| 4 - Family and community involvement | Families and authorised professionals receive clear information about safety expectations, complaints and reporting.                         |
| 5 - Equity and diversity             | Individual needs, disability, culture, language, religion, gender identity, sexuality and family circumstances are respected and considered. |
| 6 - Suitable and supported workers   | Workers are carefully recruited, screened, inducted, supervised and held accountable.                                                        |
| 7 - Child-focused complaints         | Children and adults can raise concerns safely, accessibly and without retaliation.                                                           |

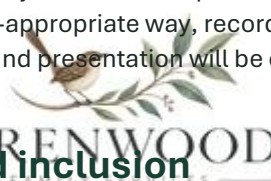
| Standard                    | Wrenwood commitment                                                                                                                  |
|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 8 - Knowledge and training  | Workers receive ongoing education about abuse indicators, grooming, disclosures, boundaries, reporting and culturally safe practice. |
| 9 - Safe environments       | Physical, community, vehicle and online settings are risk assessed and actively supervised.                                          |
| 10 - Review and improvement | Incidents, feedback, complaints, audits, children's views and changes in law or guidance are used to strengthen practice.            |
| 11 - Documented practice    | Policies, procedures, records and codes of conduct clearly describe and support child-safe operations.                               |

## 6. Rights and participation of children

Every child using Wrenwood has the right to:

- feel and be safe, respected, included and free from abuse, grooming, intimidation, discrimination and retaliation;
- receive an age-appropriate explanation of what will happen, who the supervisor is and how to ask for help;
- be listened to and have their views taken seriously, while recognising that Wrenwood does not ask children to decide adult legal disputes;
- say when they feel uncomfortable, worried or unsafe and to request a break or support;
- ask questions or make a complaint in a way they can understand;
- have their culture, identity, communication needs, disability and abilities respected; and
- have information about them handled respectfully and only for legitimate service, safety or legal purposes.

A child will not be physically forced or coerced by Wrenwood to participate in a visit. A supervisor may encourage and support participation in an age-appropriate way, record relevant observations and follow the agreed escalation process. The child's safety and presentation will be considered separately from adult preferences or expectations.



## 7. Cultural safety, equity and inclusion

### 7.1 Aboriginal children and young people

- Wrenwood acknowledges that connection to culture, family, community and Country supports safety and wellbeing.
- A child's Aboriginal identity will be respected and opportunities to express culture will be supported where relevant to the service.
- Racism, stereotyping and culturally unsafe conduct will be identified and addressed promptly.
- Workers receive guidance on cultural safety and active anti-racism. Where appropriate and authorised, Wrenwood will seek culturally informed advice rather than making assumptions about a child or family.
- Policy and service review should include Aboriginal or culturally informed consultation where reasonably practicable and relevant.

### 7.2 Diverse and individual needs

Wrenwood will consider the needs of children with disability, developmental differences, communication needs, trauma histories, culturally and linguistically diverse backgrounds, religious beliefs, diverse gender identities or sexualities, and children who may be unable to advocate for themselves.

- Intake and risk assessment will identify reasonable adjustments, accessibility needs and preferred communication methods.
- Interpreters or communication supports may be arranged where appropriate and authorised.
- A child or family will not be treated less favourably because of race, religion, sex, gender identity, sexuality, disability, family structure, culture or personal circumstances.
- Where a proposed venue or service method creates an avoidable barrier, Wrenwood will consider a safer and more accessible alternative.

## 8. Governance and responsibilities

### 8.1 Director / Head of Wrenwood

- sets, models and resources a child-safe culture;
- appoints a suitably trained Child Safety Officer and confirms who is the legal Head of Organisation for any applicable regulatory scheme;
- ensures screening, training, complaints, reporting, risk controls and record systems are implemented;
- takes immediate protective action when a concern involves a worker;
- ensures applicable police, Child Protection, court and regulator notifications occur;
- ensures Wrenwood monitors the Commonwealth Children's Contact Services accreditation framework and Victorian regulatory changes; and
- reviews child-safe systems at least annually and after serious incidents or material changes.

### 8.2 Child Safety Officer

- is the central contact for child-safety concerns and child-focused complaints;
- supports workers to identify immediate protective action and external reporting duties;
- maintains confidential incident, complaint, training and screening records;
- coordinates risk reviews, corrective actions and follow-up;
- tracks legislative and regulator guidance changes relevant to child safety; and
- escalates matters to the Director / Head without delay.

### 8.3 All workers

- place child safety ahead of convenience, adult preferences and organisational reputation;
- follow this policy, the Child Safe Code of Conduct, service procedures, lawful orders and reasonable directions;
- maintain professional boundaries and active supervision;
- report every child-safety concern internally without delay and make any personal legally required external report;
- participate in screening, induction, supervision, training and review; and
- protect confidential information and preserve accurate records.



## 9. Recruitment, screening and worker support

Wrenwood uses child-safe recruitment and ongoing monitoring. Before a person begins child-facing duties, Wrenwood will:

- use a position description that states child-safety responsibilities and expected professional boundaries;
- assess values, judgement, boundaries and suitability to work with children during recruitment;
- verify identity, relevant qualifications and work history and obtain at least two relevant referees where practicable;
- require and verify an Employee Working with Children Clearance for paid child-related work, unless a lawful exemption applies and the Director has documented why the exemption is acceptable;
- require workers to add or update Wrenwood as an organisation connected with their WWC Clearance and maintain a register of Check number, type, status and expiry date;
- use the official WWC Status Checker before engagement and periodically thereafter;
- obtain any additional police, qualification, registration, first aid or driving checks required for the role or risk assessment;
- provide child-safety induction before child-facing duties; and
- require written acknowledgement of this policy and the Child Safe Code of Conduct.

**WRENWOOD'S SCREENING STANDARD**

The Worker Screening Act permits some child-related work while a WWC application is being assessed, subject to the Act. Wrenwood adopts a stricter internal standard: unless the Director records a lawful and risk-assessed exception, a worker must hold a verified current Employee WWC Clearance before undertaking Wrenwood child-facing duties.

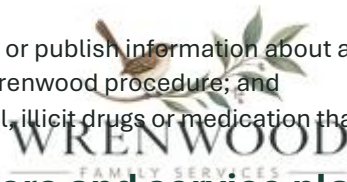
A WWC Clearance is only one safeguard. Conduct, supervision, suitability, complaints and changes in status must be monitored throughout engagement.

A worker must immediately tell Wrenwood of any charge, investigation, exclusion, interim bar, suspension, expiry, cancellation or other change that may affect their ability or suitability to perform child-related work. A person must not perform child-related duties while legally prohibited, suspended, excluded or barred.

**10. Child-safe conduct and professional boundaries**

All workers must comply with the Child Safe Code of Conduct at Appendix A. At a minimum, workers must:

- treat children respectfully and use calm, age-appropriate communication;
- remain alert, present and able to observe and intervene throughout the service;
- avoid favouritism, humiliation, threats, intimidation, sexualised behaviour, discriminatory language and unnecessary secrecy;
- avoid unnecessary physical contact; any contact must be appropriate, child-led or reasonably necessary for safety, first aid or an approved care need;
- never develop a private, social, financial or sexual relationship with a child or family met through Wrenwood;
- never privately communicate with a child through personal phone numbers, messaging apps, email, gaming platforms or social media;
- never exchange personal gifts, money, loans or promises with a child or family outside approved service arrangements;
- never photograph, film, audio-record or publish information about a child except where expressly authorised, lawful and required by Wrenwood procedure; and
- never attend work affected by alcohol, illicit drugs or medication that makes safe supervision impossible.

**11. Eligibility, intake, orders and service planning**

Wrenwood may accept families using a court order, parenting plan, written agreement, professional referral or other lawful arrangement that clearly identifies the service required. Each matter is individually assessed before acceptance.

- Separate intake is generally completed with each parent or relevant carer so history, safety concerns, expectations and logistics can be identified without creating unnecessary adult conflict.
- Current parenting orders, intervention orders, injunctions, parenting agreements, safety plans and relevant professional information are requested and reviewed before service where reasonably necessary.
- Children are familiarised in an age-appropriate way where appropriate, including how to identify the supervisor and how to ask for help.
- Known risks, prohibited contact, authorised participants, arrival/departure arrangements, medical needs, disability needs, communication restrictions, emergency contacts and approved service locations are documented.
- No participant may assume Wrenwood has received a changed order or agreement until Wrenwood confirms receipt and acceptance of the change.
- Wrenwood may seek clarification from parties, lawyers, caseworkers or the court where instructions or orders are ambiguous or conflicting.
- Wrenwood may decline, postpone, change, suspend or end a service where adequate safety cannot be achieved, the requested arrangement is outside Wrenwood's capability, required information is withheld, or the service would require a breach of law or court order.

Acceptance of a referral is not a guarantee that every booked session will proceed. The supervisor retains authority to respond to safety and compliance conditions as they arise.

## 12. Safe service delivery

### 12.1 Supervision standard

The supervisor must remain in a position that permits effective observation and intervention. For ordinary supervised contact, this means remaining within sight and hearing so far as reasonably practicable, while allowing age-appropriate privacy where it can be safely managed. The supervisor must not leave the child and supervised participant together contrary to the agreed supervision level.

The needs and number of children, location, risk assessment, court order and participant behaviour determine whether an additional supervisor, different venue or enhanced controls are required.

### 12.2 Physical and community environments

- The proposed venue is risk assessed for visibility, hazards, exits, toilets, crowds, water, traffic, animals, privacy, mobile reception and any known family-violence risk.
- Arrival and departure times or locations may be staggered to reduce adult conflict and comply with orders.
- Only authorised people may attend. Unexpected persons or unsafe changes must be addressed before contact continues.
- The supervisor carries a charged phone and understands emergency, evacuation and safe-exit arrangements for the location.
- Activities outside the agreed venue require prior approval where they materially change risk, travel, supervision or cost.

### 12.3 Participant conduct during visits and changeovers

Parents and attendees must comply with Appendix B. In particular, they must:

- arrive on time and notify Wrenwood as early as possible if late or unable to attend;
- not discuss court proceedings, allegations, the other parent, adult finances, living arrangements or other adult disputes in the child's hearing;
- attend free from the effects of alcohol or illicit drugs and not behave in a threatening, intimidating or aggressive manner;
- not use the child to pass messages, question the child about the other household or seek information the child should not be asked to provide;
- not pass messages, gifts, documents or property to another party except as approved by Wrenwood or where directly required for the child's immediate care, health or safety; and
- not bring an additional person unless that person has been disclosed, risk assessed where necessary and approved in advance.

### 12.4 Intervening in, pausing or ending a service

A supervisor may redirect, pause or end a service when continuing is not consistent with the child's safety, wellbeing, lawful orders or Wrenwood's service conditions. Examples include:

- the child becomes distressed, frightened, dysregulated or unsettled to a degree that continuing is not in the child's interests;
- a participant repeatedly introduces prohibited adult or court-related topics;
- a participant appears impaired by alcohol or drugs, carries or produces a weapon, threatens or uses violence, or creates an unacceptable risk;
- a person attempts prohibited contact, unauthorised recording, removal of the child without authority, or attendance by an unauthorised person;
- a participant refuses a reasonable safety direction or otherwise breaches the Service Agreement or Conduct Rules; or
- an unforeseen environmental, medical, staffing or security risk cannot be safely controlled.

Where a service is ended early, Wrenwood will document the reasons and notify the parties and relevant authorised referrer or professional as appropriate, subject to privacy, safety, court directions and legal reporting restrictions.

## 12.5 Toileting, personal care, medication and first aid

- Age-appropriate privacy is respected without abandoning effective supervision or creating an avoidable one-to-one risk.
- Parents remain responsible for ordinary personal care unless a written service plan states otherwise.
- Workers do not administer medication except under an approved written arrangement or emergency direction.
- First aid is provided within the worker's training and emergency services are contacted where required. First aid and medical incidents are recorded.
- Relevant allergies, medical alerts, disability needs and emergency plans should be identified during intake and kept accessible to authorised workers.

## 12.6 Alcohol, drugs, weapons and unsafe conduct

A service will not proceed, or will be ended, if a participant appears materially impaired, possesses a weapon, behaves violently or threateningly, breaches a safety requirement, attempts prohibited contact, attempts to remove a child without authority, or otherwise creates an unacceptable risk. The supervisor will prioritise immediate safety, contact emergency services where required and document the incident.

## 12.7 Transport

Transport is only provided when expressly accepted by Wrenwood and documented in the service plan. The driver must be appropriately licensed and insured, the vehicle roadworthy, lawful child restraints used, routes and handovers approved, and no unauthorised passenger may travel. Wrenwood may decline transport where safety, fatigue, distance, behaviour, restraint requirements or insurance conditions cannot be adequately managed.

## 12.8 Online or virtual contact

- Only Wrenwood-approved platforms, accounts and links may be used.
- The supervisor remains present and able to hear and observe the session to the agreed supervision level.
- Private chat, unauthorised recording or screenshots, exchange of personal contact details and unapproved third-party participation are prohibited.
- The service may be paused or ended if online safety, supervision or privacy cannot be maintained.



# 13. Observational reporting and record integrity

Where Wrenwood provides an observational report, the report must be factual, neutral and based on what was directly seen, heard or otherwise legitimately recorded during the service. Workers must distinguish fact, direct quotation, reported information and professional observation from assumption or opinion.

- Notes should be made contemporaneously or as soon as practicable after the service and must identify the date, time, location, participants and material events.
- Direct quotations should be used only where reasonably accurate and relevant. Paraphrasing must not be presented as an exact quotation.
- Reports must not diagnose, make psychological findings, determine disputed allegations, recommend parenting outcomes or purport to be an expert family report unless Wrenwood has been separately and lawfully engaged and the author is appropriately qualified.
- A report must not be altered to favour a party. Corrections to factual errors must be transparent and version controlled.
- Reports are provided only to authorised recipients in accordance with the Service Agreement, lawful orders, consent and applicable law.
- A subpoena, court order, police request or regulator notice must be referred immediately to the Director or authorised legal contact and relevant records preserved.

## 14. Responding to a disclosure, allegation or child-safety concern

When a child discloses harm or a worker observes, receives or reasonably suspects a child-safety concern, the worker must:

1. Protect immediate safety. If anyone is in immediate danger or requires urgent police, fire or ambulance assistance, call 000 and follow emergency directions.
2. Listen calmly. Allow the child to use their own words. Do not interrogate, investigate, challenge, coach or ask leading questions.
3. Reassure appropriately. Tell the child they did the right thing by speaking and that the concern will be taken seriously. Do not promise secrecy.
4. Explain the next step in simple language. Tell the child that information will only be shared with people who need it for safety, support or legal obligations.
5. Record promptly. Record date, time, location, people present, the child's words where possible, observations and actions taken. Separate fact from opinion.
6. Report without delay. Notify the Child Safety Officer or Director and make any legally required external report. Internal escalation must never delay urgent or mandatory reporting.
7. Preserve privacy and evidence. Do not discuss the matter with unauthorised people, confront an alleged perpetrator or conduct a parallel investigation that could compromise police, Child Protection or regulator action.
8. Support the child. Consider immediate emotional, cultural, communication, medical and practical needs while avoiding repeated questioning.

### 14.1 Telling parents or carers

Wrenwood will inform a parent or carer when appropriate unless doing so may increase risk, compromise a Victoria Police or Child Protection response, breach an order, expose a protected person, prejudice an investigation or be contrary to agency advice. When uncertain, Wrenwood should seek direction from the relevant authority before disclosure.

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## 15. External reporting and legal obligations

Wrenwood requires all workers to act on reasonable child-safety concerns even where the worker is not personally within a statutory mandatory-reporter category. The following pathways apply in addition to any matter-specific legal advice or authority direction:

| Situation                    | Required response                                                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Immediate danger / emergency | Call 000 immediately and follow emergency-service directions.                                                                                                                                                                                                                                                                                                                                                           |
| Child may need protection    | Any person may report to DFFH Child Protection where there are reasonable grounds that a child is in need of protection. Wrenwood will make or support a report where the circumstances warrant it. Business-hours intake is based on where the child normally lives; the current official DFFH contact must be checked. The statewide After Hours Child Protection Emergency Service is 13 12 78 as at 20 August 2026. |
| Statutory mandatory reporter | A worker who is personally a prescribed mandatory reporter must comply with the Children, Youth and Families Act 2005 (Vic), including reporting as soon as practicable where the statutory threshold is met. Wrenwood supervision work by itself should not be assumed to make every worker a statutory mandatory reporter.                                                                                            |
| Failure to disclose          | All adults must report to Victoria Police as soon as possible where the failure-to-disclose offence applies, including a reasonable belief that an adult has committed a sexual offence against a child under 16 in Victoria, unless a lawful reasonable excuse or exemption applies.                                                                                                                                   |
| Failure to protect           | A person in a position of authority must take reasonable steps to reduce or remove a known substantial risk that an adult associated with the organisation will sexually abuse a child under 16 who is under the organisation's care, supervision or authority.                                                                                                                                                         |
| Suspected criminal conduct   | Report suspected criminal conduct to Victoria Police. Do not conduct an internal investigation in a way that could compromise police action or evidence.                                                                                                                                                                                                                                                                |

| Situation                                          | Required response                                                                                                                                                   |
|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Wellbeing concern below Child Protection threshold | Consider an appropriate support or family-violence referral, with consent where required and where doing so is safe and lawful.                                     |
| Court / regulator obligation                       | Comply promptly with any lawful court, regulator or statutory notification requirement. If a notification duty is personal, internal reporting does not replace it. |

### DO NOT USE A BLANKET "MANDATORY REPORTER" LABEL

Victorian mandatory-reporting law applies to specified categories of people. Wrenwood therefore adopts a stronger organisational rule - every worker must raise every child-safety concern internally - while still distinguishing that internal rule from the statutory mandatory-reporting duty that applies only where the law makes the particular worker a mandatory reporter.

This avoids both under-reporting and an inaccurate statement of legal status.

## 16. Allegations involving Wrenwood workers

Any allegation, boundary breach or child-safety concern involving a Wrenwood worker will be taken seriously regardless of whether it arose during work, outside work, before engagement or after the person left Wrenwood.

- The person receiving the allegation must immediately notify the Child Safety Officer or Director. If the allegation concerns that person, it must be escalated to the other nominated leader or directly to the appropriate external authority.
- Wrenwood will assess and implement immediate protective measures, which may include removing the worker from child-related duties, changing supervision, preserving records and preventing contact with affected children.
- Procedural fairness will be maintained without compromising child safety, evidence, privacy, police action or regulator requirements.
- Suspected criminal conduct will be reported to Victoria Police. Police directions take priority over an internal investigation.
- Relevant WWC Check, professional, contractual and employment obligations will be considered and documented.
- Findings, actions and systemic lessons will be recorded and followed through.



## 17. Privacy, confidentiality, information sharing and records

Wrenwood collects and handles highly sensitive family, safety and health information. Privacy is therefore treated as both a legal obligation and a child-safety control.

- Wrenwood collects only information reasonably necessary for intake, risk assessment, safety, service delivery, observational reporting, billing, complaints and legal compliance.
- Health information handled in Victoria is managed consistently with the Health Records Act 2001 (Vic) and Health Privacy Principles. This includes information about disability, medication, medical conditions, injuries, mental health and other health-related needs.
- Where Wrenwood is an APP entity, it will also comply with the Privacy Act 1988 (Cth), the Australian Privacy Principles and applicable Notifiable Data Breaches requirements. Wrenwood must confirm and document its APP-entity status before policy approval and when its business model or turnover changes.
- Even if a particular Commonwealth privacy provision does not legally apply, Wrenwood will use privacy-by-design practices consistent with recognised privacy principles unless inconsistent with another legal duty.
- Records must be factual, dated, securely stored, access-controlled and available only to authorised people with a legitimate need.
- Workers must use Wrenwood-approved accounts, devices and storage systems and must not retain child or family information in personal email, messaging apps, personal cloud storage or personal photographs.
- Information may be shared without consent where required or authorised by law, necessary for immediate safety or protection, or lawfully requested by police, Child Protection, a court or regulator. Information sharing must be limited to what is reasonably necessary.
- Wrenwood will provide lawful access and correction rights and will respond appropriately to privacy incidents and data breaches.

- Records must not be altered, destroyed, backdated or withheld after an incident, complaint, subpoena, regulator request, litigation hold or anticipated legal process.
- Retention and secure disposal must follow an adopted records-retention schedule based on applicable legal requirements, contractual obligations and limitation periods. Wrenwood must not invent a destruction period without confirming the applicable legal basis.

### 17.1 Children's Contact Services safety information

The Family Law Act 1975 (Cth) contains special confidentiality and admissibility provisions for safety information in the accredited Children's Contact Services framework. Because the accreditation scheme is still being implemented, Wrenwood must monitor commencement and obtain legal advice on when those provisions apply to Wrenwood. As a minimum internal practice, safety information will be used and disclosed only for legitimate service, safety and legal purposes and only to people who need it.

## 18. Complaints and feedback

A child or adult may raise a child-safety concern, service complaint or feedback verbally to any Wrenwood worker, by email to [admin@wrenwoodfamilyservices.com](mailto:admin@wrenwoodfamilyservices.com), by the published complaints phone number, or through an authorised support person, lawyer or caseworker.

- Children may use their own words, drawings, gestures, communication devices or a trusted support person. They do not need formal language or proof before Wrenwood responds.
- Wrenwood will promptly acknowledge the concern, assess immediate safety and triage any child-safety component before treating it as an ordinary service complaint.
- The process will be explained in an accessible and age-appropriate way.
- The person raising the concern will be protected from retaliation so far as Wrenwood can lawfully control.
- Information will be shared only as necessary for safety, procedural fairness and legal compliance.
- Wrenwood will keep appropriate records and provide an outcome where lawful and appropriate.
- A complaint will never be used to discourage, delay or replace a required report to Victoria Police, Child Protection or a regulator.
- Where appropriate, the person will be told about external options, including their lawyer or caseworker, the relevant court, Victoria Police, DFFH Child Protection, the Social Services Regulator or another regulator with jurisdiction.



Service complaints should be reviewed by a person who is sufficiently independent of the conduct complained about. Where the complaint concerns the Director or Child Safety Officer, the matter must be directed to the alternate nominated leader or appropriate external authority.

## 19. Cancellations, rescheduling and fees

- Families should give as much notice as possible when a booked service needs to change.
- Cancellation charges and rescheduling terms are governed by Wrenwood's current Fee Schedule and Service Agreement, which must be provided before or at intake.
- Repeated late cancellations, refusal to comply with arrangements or non-attendance may affect Wrenwood's ability to continue the service and may be recorded in service records.
- Outstanding fees may affect future scheduling where permitted by the Service Agreement, but Wrenwood will not withhold or alter a legally required child-safety report because fees are unpaid.
- Where a court order or referring arrangement creates specific notice or reporting obligations about a missed visit, Wrenwood will follow those lawful requirements.

## 20. Emergency and crisis limitations

Wrenwood is not an emergency, police, Child Protection or crisis-response service. If a child or any person is in immediate danger, emergency services must be contacted on 000. Wrenwood staff must not attempt to manage a situation beyond their role, training or reasonable safety capability.

Where family-violence, mental-health or other support needs exceed Wrenwood's service role, Wrenwood may provide information about appropriate specialist services or require the parties to obtain additional professional support before service continues.

## 21. Training, supervision and worker wellbeing

Before child-facing work and at planned intervals, workers will receive training appropriate to their role, including:

- the Victorian Child Safe Standards and this policy;
- indicators of child abuse, grooming, neglect, family violence, coercive control and trauma;
- responding to disclosures and documenting observations without leading or investigating;
- internal and external reporting duties, including mandatory reporting, failure to disclose and failure to protect;
- professional boundaries and the Child Safe Code of Conduct;
- Aboriginal cultural safety, active anti-racism, equity, disability and inclusive communication;
- venue, transport, online-service and lone-worker risk controls;
- de-escalation, emergency response and first aid appropriate to the role;
- privacy, health-information handling, data security and records; and
- changes to Children's Contact Services accreditation and other relevant legal requirements.

Workers will receive regular supervision and may access debriefing after difficult incidents. Debriefing must protect confidentiality and must not replace formal reporting, incident review or professional support where required.

## 22. Risk management, consultation and continuous improvement

- Child-safety risks are considered at organisational, worker, family, venue, activity, transport, technology and information-security levels.
- Controls are documented, assigned, communicated and reviewed when circumstances change.
- Incidents, near misses, disclosures, complaints, feedback, audit findings and children's views are analysed for systemic lessons.
- Corrective actions are assigned, tracked to completion and communicated to affected workers.
- Wrenwood will seek feedback from children, families, workers and relevant community or cultural stakeholders in ways proportionate to its size and service model. Stakeholder feedback will inform policy and procedure development.
- Relevant findings from child-safety reviews will be communicated, in an appropriate and privacy-protective way, to workers and, where relevant, children, families and the community.
- Third-party venues, contractors, platforms and services used in child-related work must be selected and managed with child safety in mind.
- This policy and related systems are reviewed at least annually and after a serious incident, material complaint, legislative change, accreditation development or regulator guidance update.

## 23. Breaches and non-compliance

A breach of this policy may result in immediate protective controls, removal from duties, additional supervision, disciplinary action, termination of employment or contract, service suspension, referral to police, Child Protection, the Social Services Regulator, Working with Children Check functions or another relevant body.

Wrenwood may take interim risk-management action before an allegation is proven where that action is reasonably necessary to protect children, preserve evidence or meet legal obligations. Interim action is not a finding of guilt and must be documented and reviewed.

## 24. Accreditation, registration and regulatory change

### 24.1 Commonwealth Children's Contact Services accreditation

The Family Law Act 1975 (Cth) now contains a statutory framework allowing Accreditation Rules to regulate Children's Contact Services. Wrenwood's supervised contact and changeover activities are likely to fall within the statutory concept of a Children's Contact Service. As at the legal currency date of this policy, the Attorney-General's Department continues to describe the accreditation scheme as under development and consultation/impact-analysis work has been undertaken.

Wrenwood must monitor the Attorney-General's Department and Federal Register of Legislation. If Accreditation Rules commence and require accreditation for Wrenwood's services, Wrenwood must not provide regulated

services unless the business and each relevant practitioner hold the accreditation required by law. Any prescribed qualification, training, complaint, evidence, safety, record, audit or service-standard requirements must be implemented before the applicable commencement date.

## 25. Related procedures, forms and records

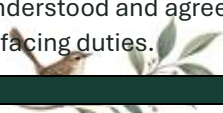
This policy is supported by, or should be implemented with, the following controlled documents and records:

- Service Agreement and current Fee Schedule;
- Intake Form and family / child-safety risk assessment;
- Child Safety Incident and Reporting Procedure and incident form;
- Complaints and Feedback Procedure and complaint register;
- Recruitment, Screening and WWC Check Procedure and screening register;
- Privacy Policy, data-breach response procedure and records-retention schedule;
- Venue, transport, online-service and activity risk-assessment templates;
- Emergency and critical-incident procedure;
- worker induction, training and supervision records;
- observational report template and report quality-control checklist; and
- regulatory compliance register covering Child Safe Standards, RCS status, WWC, privacy, Children's Contact Services accreditation and any SSR registration obligations.

## 26. Review, approval and acknowledgement

This policy is reviewed at least every 12 months and earlier where required by a serious incident, material complaint, audit finding, service change, new funding arrangement, legislative change, accreditation rule, court direction or regulator guidance update.

All workers must confirm that they have read, understood and agree to comply with this policy and the Child Safe Code of Conduct before undertaking child-facing duties.

| I agree to the above | Details                                                                                         |
|----------------------|-------------------------------------------------------------------------------------------------|
| Name                 | <br>WRENWOOD |
| Position             |                                                                                                 |
| Signature            |                                                                                                 |
| date                 |                                                                                                 |
|                      | [                                                                                               |

## Appendix A - Child Safe Code of Conduct

This Code applies to every Wrenwood worker. It must be read with the policy and any role-specific procedure. A breach must be reported and may result in immediate protective or disciplinary action.

### A.1 Workers must

- act in the best interests of children and treat every child with dignity, respect and fairness;
- listen to children and take concerns seriously;
- use calm, age-appropriate, non-shaming language and maintain professional boundaries;
- maintain active supervision and remain able to intervene;
- respect Aboriginal culture and identity and actively challenge racism or culturally unsafe conduct;
- respect disability, culture, language, religion, gender identity, sexuality and family circumstances;
- follow court orders, intervention orders, service plans and Wrenwood safety directions;
- report child-safety concerns and suspected breaches promptly;
- record observations and incidents accurately and preserve records;
- use approved Wrenwood communication and information systems; and
- raise any conflict of interest, prior relationship or circumstance that could compromise neutrality or safety.

### A.2 Workers must never

- hit, physically punish, humiliate, threaten, intimidate, ridicule, shame or discriminate against a child;
- engage in sexual conduct, sexualised conversation, grooming, exploitation or unnecessary secrecy with a child;
- use unnecessary physical contact or isolate a child in a way not justified by safety, care or the service plan;
- develop a private friendship, social relationship, financial relationship or sexual relationship with a child or family met through Wrenwood;
- contact a child through a personal phone, private messaging account, social media or gaming platform;
- give or receive undisclosed personal gifts, money, loans or favours that create a boundary risk;
- photograph, film, audio-record, screenshot or publish a child or family unless specifically authorised and lawful;
- consume alcohol or illicit drugs before or during work or work while impaired;
- bring a weapon to a Wrenwood service except where lawfully carried by an authorised emergency or law-enforcement officer;
- coach a child, ask leading questions, investigate an abuse allegation or promise secrecy;
- alter an observation record to suit a party or remove relevant information because it is inconvenient; or
- ignore a child-safety concern because another person has said they will deal with it.

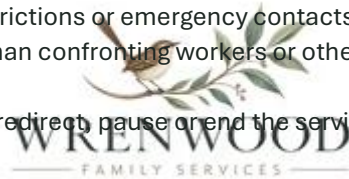
### A.3 Boundary concerns and gifts

Any unexpected gift, request for private contact, invitation, social-media connection, financial offer or relationship development that could affect professional boundaries must be disclosed to the Child Safety Officer or Director. Workers must politely decline arrangements that are inconsistent with Wrenwood's professional role.

## Appendix B - Participant and Attendee Conduct Rules

These rules are intended to keep services calm, child-focused and consistent. They should also be incorporated into Wrenwood's Service Agreement or participant information.

- Follow all lawful court orders, intervention orders, agreed service arrangements and reasonable supervisor directions.
- Arrive and depart at the agreed time and location. Do not approach, follow, contact or wait for another party contrary to the agreed arrangements.
- Do not discuss court proceedings, allegations, adult relationships, finances, living arrangements or criticisms of another parent in the child's presence.
- Do not ask the child to carry messages, keep secrets, report on the other household or choose sides.
- Do not attend affected by alcohol or illicit drugs. Do not bring weapons, threaten, intimidate, harass or behave aggressively.
- Do not photograph, film, audio-record, livestream, screenshot or otherwise record the service unless Wrenwood has expressly authorised it and it is lawful.
- Do not bring an additional adult, child or support person unless Wrenwood has approved that attendance in advance.
- Do not exchange documents, property, gifts or messages between adults except as approved by Wrenwood or required for the child's immediate care, health or safety.
- Respect the child's physical boundaries and emotional presentation. Do not force affection, questioning or participation.
- Do not remove the child from the agreed location, vehicle or supervisor's observation without authority.
- Do not obtain or attempt to obtain a worker's private contact details, social-media details or personal information.
- Tell Wrenwood promptly about changes to orders, intervention orders, safety risks, medical needs, authorised participants, contact restrictions or emergency contacts.
- Use the complaints process rather than confronting workers or other participants during the child's service time.
- Understand that the supervisor may redirect, pause or end the service when safety, lawful orders or these rules require it.



## Appendix C - Child Safety Response and Reporting Quick Guide

### FIRST PRIORITY - IMMEDIATE SAFETY

If anyone is in immediate danger or needs urgent police, fire or ambulance assistance, call 000. Do not delay urgent action to complete an internal form or obtain management approval.

| Step | Action                      | Minimum response                                                                                                                                 |
|------|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| 1    | Receive / observe concern   | Stay calm. Protect immediate safety. Do not investigate or ask leading questions.                                                                |
| 2    | Listen and support          | Allow the child to speak in their own words. Do not promise secrecy.                                                                             |
| 3    | Record                      | Record date, time, place, who was present, exact words where possible, observations and actions. Separate fact from opinion.                     |
| 4    | Internal escalation         | Notify Child Safety Officer / Director immediately. If the concern is about that person, use the alternate leader or external authority.         |
| 5    | External reporting          | Make any legally required report personally and without delay. Internal escalation does not replace a personal statutory duty.                   |
| 6    | Preserve evidence / privacy | Do not confront the alleged perpetrator, circulate information or start a parallel investigation that may compromise police or regulator action. |
| 7    | Protect and follow up       | Implement interim controls, support the child, preserve records, follow authority directions and review the risk assessment.                     |

### C.1 Key external pathways

- Emergency / immediate danger: 000.
- DFFH Child Protection: use the business-hours intake service for the area where the child normally lives; check the current Victorian Government contact page. Statewide After Hours Child Protection Emergency Service: 13 12 78 (verified at the legal currency date).
- Victoria Police: for suspected criminal conduct and where failure-to-disclose obligations apply.
- Social Services Regulator: for Reportable Conduct Scheme notifications if Wrenwood is confirmed to be within scope, and for Child Safe Standards regulatory matters as applicable.

### C.2 When a concern is about a worker

Protect the child first. Notify the Child Safety Officer or Director unless the allegation concerns that person. Consider immediate removal from child-facing duties, no-contact directions and preservation of records. Report criminal conduct to police. If RCS applies, the Head must meet the 3-business-day and 30-calendar-day notification requirements.

## Appendix D - Pre-Approval Compliance Checklist

This checklist is part of the policy. The policy should not be marked "approved" until these items are completed or the Director records a lawful reason why an item is not applicable.

|  | Compliance action                                                                                                                                                                          |
|--|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | Confirm Wrenwood's legal entity name, ABN/ACN (as applicable) and governance structure.                                                                                                    |
|  | Identify the legal Head of Organisation for any Reportable Conduct Scheme purpose and retain the basis of that determination.                                                              |
|  | Obtain written confirmation from the Social Services Regulator whether Wrenwood is currently within the Reportable Conduct Scheme.                                                         |
|  | Confirm whether Wrenwood currently provides an in-scope social service requiring SSR registration or Services Standards compliance, including checking any DFFH-funded or contracted work. |
|  | Nominate and train the Child Safety Officer; insert name and position in document control.                                                                                                 |
|  | Insert and publish the complaints phone number; test the admin@wrenwoodfamilyservices.com contact pathway.                                                                                 |

|  | Compliance action                                                                                                                                                                                                                                              |
|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | Confirm Wrenwood's Privacy Act / APP entity status, including whether its activities amount to providing a health service and whether any other small-business exception applies.                                                                              |
|  | Adopt a Privacy Policy, data-breach response procedure and legally informed records-retention schedule.                                                                                                                                                        |
|  | Verify every paid child-related worker holds the correct Employee WWC Clearance (or document a lawful exemption) and record Check number, type, status and expiry.                                                                                             |
|  | Ensure workers have added Wrenwood to their WWC Check organisation details where required.                                                                                                                                                                     |
|  | Complete referee, identity, qualification, police, first aid and driving checks appropriate to each role.                                                                                                                                                      |
|  | Issue and obtain signed acknowledgement of this policy and Appendix A Child Safe Code of Conduct.                                                                                                                                                              |
|  | Adopt Service Agreement, Participant Conduct Rules, intake form, child-safety risk assessment, incident response form and complaints procedure.                                                                                                                |
|  | Adopt venue, transport and online-service risk-assessment templates and an emergency / critical-incidents procedure.                                                                                                                                           |
|  | Establish secure Wrenwood-approved records, email and file-storage systems; prohibit personal storage of child/family information.                                                                                                                             |
|  | Create a regulatory compliance register and nominate who checks legal/regulator updates.                                                                                                                                                                       |
|  | Monitor the Attorney-General's Department and Federal Register of Legislation for Children's Contact Services Accreditation Rules; do not commence any activity that becomes accreditation-mandatory without required business and practitioner accreditation. |
|  | Obtain Victorian legal or specialist child-safety review of the final policy, service agreement and operational procedures before final adoption.                                                                                                              |
|  | Record stakeholder consultation used to inform the policy, including workers and, where practicable, children/families and culturally informed stakeholders.                                                                                                   |
|  | Set the approval date and next review date; distribute the approved version and remove superseded versions from use.                                                                                                                                           |



## Appendix E - Official legal and guidance sources

The policy was consolidated from Wrenwood's two draft policies and checked against official sources available on 20 August 2026. The following are reference sources, not substitutes for legal advice:

| Area                                 | Official source / framework                                                                                                                                                                                 |
|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Victorian Child Safe Standards       | Child Wellbeing and Safety Act 2005 (Vic); Social Services Regulator / Victorian Government Child Safe Standards pages; CCYP guidance on the 11 Child Safe Standards and Standard 11 compliance indicators. |
| Reportable Conduct Scheme            | Child Wellbeing and Safety Act 2005 (Vic); Social Services Regulator / Victorian Government Reportable Conduct Scheme guidance, including Head notification timeframes.                                     |
| Child Protection and criminal duties | Children, Youth and Families Act 2005 (Vic); DFFH Child Protection guidance; Crimes Act 1958 (Vic) obligations concerning failure to disclose and failure to protect.                                       |
| Working with Children Check          | Worker Screening Act 2020 (Vic); Social Services Regulator / Victorian Government guidance for organisations and WWC Status Checker.                                                                        |
| Privacy and health information       | Health Records Act 2001 (Vic) and Health Privacy Principles; Privacy Act 1988 (Cth), Australian Privacy Principles and OAIC guidance where applicable.                                                      |
| Children's Contact Services          | Family Law Act 1975 (Cth), Division 3A; Attorney-General's Department Children's Contact Services Reform and accreditation materials.                                                                       |
| Family violence                      | Family Violence Protection Act 2008 (Vic) and any intervention order applying to a matter.                                                                                                                  |
| Social services regulation           | Social Services Regulation Act 2021 (Vic), Social Services Standards and Social Services Regulator registration guidance where Wrenwood becomes an in-scope provider.                                       |

### CURRENCY NOTE

Laws, regulator responsibilities, accreditation rules, contact details and guidance can change. Wrenwood must check current official sources whenever a child-safety report, regulator notification or legal decision is required and during every scheduled policy review.

This document is a compliance-directed operational policy, not a substitute for advice from a lawyer about Wrenwood's particular legal entity, contracts, funding, insurance, court matters or regulatory status.