



SPLASH CENTRE

Outside School Hours Care
34/76 Trevenar Street, Ashbury NSW 2193

Child Safe Code of Conduct

Policy and Procedure

Policy version	2026.1
Approved by	Splash Management
Date approved	June, 2026
Date of next review	June, 2027
Responsible officer	Approved Provider / Splash Management, supported by the Nominated Supervisor
Audience	Educators, staff, volunteers, families, regulatory authorities

PART A POLICY

1. Policy title

Child Safe Code of Conduct

2. Policy statement

Splash Centre is committed to child safety. All persons associated with our service are expected to uphold the highest standards of professional conduct in all interactions with children. This Code of Conduct is a condition of working with or for Splash Centre.

Breaches of this Code will be taken seriously and may result in disciplinary action, including termination, referral to the Reportable Conduct Scheme, and notification to relevant authorities.

3. Background and purpose

This Child Safe Code of Conduct sets out the standards of behaviour expected of all persons working with children at Splash Centre. It is a mandatory requirement under the NSW Child Safe Scheme (Children's Guardian Act 2019, Standard 5) that child-related organisations have a Code of Conduct that all staff, volunteers, and contractors read, understand, and sign.

This Code works alongside Splash Centre's Child Protection and Mandatory Reporting Policy, Relationships with Children Policy, and Child Safe Environment Policy to create a comprehensive framework for child safety.

This Code of Conduct applies to ALL persons associated with Splash Centre, including:

- All educators, coordinators, and the Director
- Administrative and support staff
- Volunteers and students on placement
- Contractors and external providers who have contact with children
- Committee of Management members

All persons covered by this Code must sign the acknowledgement (Appendix B) before commencing work or contact with children.

4. Legislative and regulatory requirements

This policy is consistent with, and refers to, the following legislation and instruments:

Reference	Description
Children's Guardian Act 2019 (NSW) Standard 5	Requires organisations working with children to have and enforce a Code of Conduct for all personnel.

Children and Young Persons (Care and Protection) Act 1998 (NSW)	Mandatory reporting obligations; child protection framework. Breaches of this Code may trigger mandatory reporting obligations.
Education and Care Services National Regulations 2011 Reg 155, 156	Prohibited practices physical force, corporal punishment, humiliation, isolation, withholding necessities.
Child Protection (Working with Children) Act 2012 (NSW)	WWCC requirements apply to all persons covered by this Code.
Crimes Act 1900 (NSW) s316A	Failure to report child sexual abuse is a criminal offence.
Privacy Act 1988 (Cth) and Privacy and Personal Information Protection Act 1998 (NSW)	Confidentiality obligations for personal information about children and families.

5. Principles underpinning this policy

All decision-making under this Code at Splash Centre is guided by the following principles:

- **Paramount consideration:** The safety, health, wellbeing, rights and best interests of children are our paramount consideration in every decision (s.3 National Law; s.2A National Regulations).
- **Child-safe practice:** All standards in this Code align with the Child Safe Standards and the National Principles for Child Safe Organisations.
- **Professional accountability:** Every person associated with Splash Centre is personally accountable for their conduct with children and in upholding this Code.
- **Transparency:** All interactions with children occur in observable spaces. There are no secrets between staff and children.
- **Zero tolerance:** Breaches of this Code are taken seriously regardless of the severity or whether the behaviour was intentional.
- **Support:** Staff who report concerns about a colleague's conduct in good faith will be protected from reprisal.
- **Privacy:** Personal information about children and families is handled in line with the Australian Privacy Principles and Splash Centre's Privacy and Confidentiality Policy.

6. Key terms and definitions

Term	Definition
Grooming	Behaviours used by a perpetrator to gain the trust of a child, family, or organisation with the intent of facilitating sexual abuse or other exploitation of a child.

Professional Boundary	The limits of the professional relationship between an educator and a child or family that are necessary to protect both the child and the educator.
Reportable Conduct	Conduct by an employee that must be reported to the OCG under the Children's Guardian Act 2019 includes sexual misconduct, assault, ill-treatment, psychological harm, and neglect of a child.
ROSH (Risk of Significant Harm)	The law says a child or young person is at risk of significant harm (ROSH) if there are current concerns for their safety, welfare or wellbeing
Prohibited Practice	Any interaction, discipline strategy, or conduct that is banned under Regulation 156 or this Code.
Breach	A failure to comply with any provision of this Code of Conduct.

7. Related policies and procedures

This Code of Conduct should be read together with the following Splash Centre policies and procedures:

- Child Protection and Mandatory Reporting Policy
- Relationships with Children (Interactions with Children) Policy
- Child Safe Environment Policy
- Child Safe Procurement Policy
- Photography and Privacy Policy
- Privacy and Confidentiality Policy
- Complaints and Grievances Policy
- Enrolment and Orientation Policy

8. Induction and ongoing training

Splash Centre commits to the following arrangements so that staff can confidently and competently implement this Code:

- Induction: All new educators, staff, volunteers and students read and sign the Code of Conduct (Appendix B) within their first week. The Nominated Supervisor or delegate walks through the Code's practical application.
- Annual refresher: All educators and staff complete an annual refresher on this Code at a team meeting and re-sign the acknowledgement.
- Triggered training: Additional training is provided whenever legislation, the NSW Child Safe Standards or this Code changes; following any incident, complaint or assessment finding; and when new tools or templates are introduced.
- Practical resources: Up-to-date summaries and reminders are displayed at relevant points in the service.

- Family information: Families are introduced to this Code at orientation and can access the full document at any time.

9. Policy created / reviewed

Version	Date	Summary of change	Approved by
1.0	August 2022	Original Code of Conduct adopted by Splash Centre.	Director, Splash Centre Association
2.0	June 2026	Full review aligned to NSW Child Safe Scheme mandatory Code of Conduct requirements.	Director, Splash Centre Association

10. Monitoring, evaluation and review

This Code of Conduct is reviewed annually, or when legislation, the NSW Child Safe Standards, or service circumstances change. All staff must re-sign the acknowledgement following any substantive update. The Director is responsible for coordinating the review.

The Approved Provider, supported by the Nominated Supervisor, is responsible for monitoring, evaluating and reviewing this Code.

Review will occur:

At least annually, on the anniversary of approval (or earlier if needed)

Whenever the National Law or National Regulations are amended in a way that affects this Code

Following any incident, complaint, breach or assessment and rating finding relating to this Code

In response to feedback from families, educators, the regulatory authority (NSW Department of Education, Early Childhood Education Regulatory Authority) or ACECQA

PART B CODE OF CONDUCT

B.1 Procedure title

Child Safe Code of Conduct - Standards of Behaviour

B.2 Reference to policy and philosophy

This Code operates under and gives effect to Splash Centre's Child Safe Code of Conduct Policy (Part A) and reflects our service philosophy of safe, respectful, child-centred practice in partnership with families.

A copy of this policy and Code is kept at the service at all times, in both electronic and printed form, and is available for inspection by educators, staff, families and the regulatory authority on request (regulation 171).

B.3 Code of Conduct Standards

B.3.1 Interactions with Children

The following WILL/WILL NOT table sets out the expected standards for all educator-child interactions.

I WILL ...	I WILL NOT ...
Treat every child with dignity, respect, and warmth.	Use language that is demeaning, dismissive, threatening, or sarcastic.
Listen to children and take their ideas, feelings, and concerns seriously.	Ignore, ridicule, or minimise a child's concerns or feelings.
Engage in warm, professional, and observable interactions with children.	Have secretive conversations or interactions with individual children.
Respond to children's emotional needs with empathy and calm.	React to children with anger, impatience, or emotional volatility.
Maintain clear sightlines to all children at all times.	Supervise children from an unobservable location or leave children unobserved.
Speak to children in a way that affirms their capacity and agency.	Make a child feel stupid, worthless, or unwanted.
Support children to solve conflicts using positive strategies.	Take sides or show favouritism in conflicts between children.

B.3.2 Physical Contact

I WILL ...	I WILL NOT ...
Respond warmly to physical contact initiated by a child (e.g. a hug) where it is	Initiate or force physical contact that a child has not welcomed or consented to.

age-appropriate and in the child's best interests.	
Provide first aid or toileting assistance in line with service policies and with appropriate notification to another staff member.	Touch a child in a private area of the body outside of the context of documented first aid or approved care needs.
Use only the minimum physical restraint necessary to prevent imminent harm, and report it to the Director immediately.	Use physical force or restraint as a discipline strategy under any circumstances.
Administer physical contact (including in first aid) in an observable space.	Take a child to an unobservable space to provide physical care.
Respect children's right to bodily autonomy and if a child does not want physical contact, respect that.	Engage in any form of rough physical play or 'horseplay' that risks injuring a child.

B.3.3 Photography and Recording

I WILL ...	I WILL NOT ...
Use only service-issued devices to photograph or record children, and only in accordance with the Photography and Privacy Policy.	Use personal devices (phone, tablet, camera) to photograph, record, or film children.
Ensure photo consent has been obtained from a child's family before photographing or sharing images.	Photograph a child without family consent or against a family's expressed wishes.
Store images of children securely on service-managed systems.	Share images or video of children on personal social media accounts.
Use images of children only for legitimate program documentation purposes.	Share images of children with third parties without authorisation.

B.3.4 Digital Communication and Social Media

I WILL ...	I WILL NOT ...
Communicate with children and families only through service-sanctioned channels (e.g. approved service communication platform).	Contact children or families via personal social media, personal email, or personal phone.
Store personal devices securely during operating hours and away from children.	Use personal devices in the presence of children during the service program.
Report any concerns about inappropriate digital contact to the Director immediately.	Accept social media friendship or follow requests from children or current families.
Model safe and appropriate digital behaviour for children.	Access inappropriate or adult content on service devices.

B.3.5 Professional Boundaries

I WILL ...	I WILL NOT ...
Maintain a professional relationship with all children and families: warm, respectful, and appropriate boundaries. Treat all children equally and fairly, regardless of personal preference.	Pursue a personal friendship or relationship with a child or family that crosses professional boundaries. Show favouritism or develop a 'special relationship' with one child that is not transparent or observable.
Discuss concerns about professional boundaries with the Director. Ensure all interactions with children occur in observable spaces.	Accept gifts of significant value from children or families without disclosure to the Director. Arrange to see a child or family outside of the service without appropriate disclosure.
Disclose any personal relationship with a family to the Director before commencing work.	Allow a personal relationship with a family to influence professional decisions.

B.3.6 Prohibited and Permitted Practices

I WILL ...	I WILL NOT ...
Use only positive, approved behaviour guidance strategies as outlined in the Relationships with Children Policy.	Use corporal punishment of any kind such as smacking, hitting, shaking, or any physical force as discipline.
Guide behaviour with empathy and consistent, positive strategies.	Humiliate, belittle, ridicule, or shame a child.
Respond to challenging behaviour with calm, proportionate strategies.	Threaten a child with frightening consequences, including threats from other adults.
Ensure children always have access to food, water, comfort, and warmth.	Withhold food, water, warmth, shelter, or comfort as punishment.
Allow children appropriate freedom of movement in the service area.	Isolate a child in a confined space or restrict movement as punishment.
Administer medication only under an authorised Medical Management Plan.	Use medication to manage or alter a child's behaviour.

B.3.7 Alcohol, Drugs, and Smoking

I WILL ...	I WILL NOT ...
Arrive at work fit for duty free from the effects of alcohol or drugs.	Attend work under the influence of alcohol or any non-prescribed drug.
Disclose to the Director any prescribed medication that may affect your fitness for duty.	Consume alcohol or drugs during service hours, including during excursions.

Smoke only in designated areas and never in the presence of children or within the service area.	Smoke in any area accessible to children or in ways that may expose children to second-hand smoke.
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B.3.8 Conflicts of Interest

I WILL ...	I WILL NOT ...
Disclose any actual or perceived conflict of interest to the Director as soon as it arises.	Allow a personal relationship, financial interest, or other conflict to influence professional decisions.
Withdraw yourself from decisions where a conflict of interest may exist.	Make decisions about children, families, or staff where you have an undisclosed conflict of interest.

B.3.9 Confidentiality

I WILL ...	I WILL NOT ...
Treat all information about children and families as strictly confidential.	Share confidential information about children, families, or colleagues with unauthorised persons.
Share information about children only on a need-to-know basis and as required by law.	Discuss children or families in public spaces or in ways that breach their privacy.
Report legally required disclosures (e.g. mandatory reports) through the correct channels.	Use confidential information for personal gain or to harm another person.

B.3.10 Grooming Awareness

Grooming is a deliberate process used by perpetrators to gain access to children and facilitate abuse. All Splash Centre staff must be aware of grooming behaviours and report any concerns immediately.

Be alert to colleagues, contractors, or other adults who:

- Seek unnecessary one-on-one time with children.
- Give gifts or special attention to particular children.
- Undermine safety rules or encourage children to keep secrets.
- Show excessive physical affection with children.
- Establish contact with children or families outside of the service without transparency.
- Make sexual or inappropriate comments in the presence of children.
- Access or attempt to access children's contact information for personal use.

See Appendix A for a more detailed reference. If you observe any of these behaviours, report immediately to the Director. If the behaviour involves the Director, report to the Committee of Management.

B.3.11 Reporting Concerns

All persons covered by this Code have an obligation to report concerns about the conduct of others. This includes concerns about breaches of this Code, child protection concerns, or any behaviour that may pose a risk to children.

- Report concerns to the Director or, if the concern involves the Director, to the Committee of Management.
- Child protection concerns (ROSH) must be reported to the Child Protection Helpline: 132 111.
- Reportable conduct must be reported to the OCG within 7 days: 8219 3600.
- Immediate safety concerns - call 000.

Persons who report concerns in good faith are protected from reprisal. Anonymous reports are accepted and taken seriously.

B.3.12 Breach of this Code

A breach of this Code of Conduct is taken seriously. When a potential breach is identified:

- The Director is notified immediately (or, if the Director is involved, the Committee of Management).
- The nature of the breach is documented using an Incident Report form.
- An investigation is conducted in a timely manner, respecting confidentiality and procedural fairness.
- Where the breach may constitute reportable conduct, it is notified to the OCG within 7 days.
- Where a child has been or may be at risk, child protection procedures are followed immediately.
- Outcomes may include a formal warning, suspension, termination, or referral to relevant authorities depending on the severity of the breach.

All parties involved in an investigation are treated fairly and given the opportunity to respond to allegations. The safety of children remains the primary consideration throughout any investigation.

B.4 Roles and responsibilities

All people involved in the operation of Splash Centre have a role in upholding this Code. Ultimate legal responsibility lies with the Approved Provider.

Approved Provider:

- Ensure this Code is reviewed annually and any changes are communicated to all staff
- Ensure the Nominated Supervisor enforces this Code consistently
- Take action when breaches are reported, including referral to the Reportable Conduct Scheme where required

Nominated Supervisor:

- Model exemplary professional conduct with children at all times
- Ensure all staff, volunteers, and contractors read and sign this Code before commencing
- Investigate reported breaches promptly and in accordance with the breach procedure
- Escalate to the Approved Provider any serious breaches or alleged reportable conduct

Educators, staff, volunteers and students:

- Read, understand, and sign this Code on induction and annually thereafter
- Uphold all standards in this Code in every interaction with children
- Report any concerns about a colleague's conduct to the Nominated Supervisor immediately
- Participate in training on child safe practice

Contractors and external providers:

- Sign the Child Safety Declaration before commencing work at or near Splash Centre
- Comply with all relevant standards in this Code while on-site

B.5 Code created / reviewed

This Code was last reviewed on the date recorded in the document control table at the front of this document, in conjunction with Part A of this policy.

B.6 Monitoring, evaluation and review

The Approved Provider, supported by the Nominated Supervisor, monitors compliance with this Code on an ongoing basis through:

- Regular observation of educator-child interactions
- Review of any reported concerns or incidents involving conduct
- Staff supervision and performance review processes
- Annual policy review and Code re-acknowledgement

Formal review of this Code occurs at least annually, together with Part A, by the Approved Provider. The next review date is recorded in the document control table at the front of this document.

B.7 Useful resources

The following resources were used to inform this Code:

- Education and Care Services National Law Act 2010 legislation.nsw.gov.au
- Education and Care Services National Regulations legislation.nsw.gov.au
- ACECQA Guide to the National Quality Framework (acecqa.gov.au)
- ACECQA Child Safe Environments: Policy and procedure guidelines
- NSW Office of the Children's Guardian Child Safe Standards and Code of Conduct requirements kidsguardian.nsw.gov.au
- Children's Guardian Act 2019 (NSW)
- Children and Young Persons (Care and Protection) Act 1998 (NSW)
- NSW Department of Education Early Childhood Education Regulatory Authority

APPENDICES

Appendix A Grooming Behaviours Reference

The following behaviours may indicate that an adult is grooming a child for abuse. This is not an exhaustive list. Any concerns should be reported immediately.

Behaviour	Why it is a concern
Seeking one-on-one time with a child, especially in private or unobservable spaces	Provides opportunity for abuse away from witnesses.
Giving gifts, money, or special privileges to a child	Creates a sense of obligation or gratitude in the child; undermines normal power dynamics.
Encouraging a child to keep secrets	Isolates the child from protective adults; undermines the child's support network.
Excessive physical affection beyond what is appropriate for the relationship	May be desensitising the child to inappropriate touch; testing boundaries.
Exposing a child to adult content or sexual conversation	Testing the child's response; grooming the child to accept sexual behaviour as normal.
Making comments about a child's physical appearance or development	Inappropriate focus on a child's body; may indicate sexual interest.
Communicating privately with a child outside of service channels	Establishes a secret relationship; undermines parental oversight.
Undermining a child's trust in their parents, family, or other educators	Isolates the child and increases their dependence on the perpetrator.
Ignoring or circumventing child safety rules	Signals disregard for child safety norms; may indicate intent to abuse.

Appendix B Staff Acknowledgement Form

By signing below, I confirm that:

- I have read and understood the Splash Centre Child Safe Code of Conduct.
- I agree to comply with all provisions of this Code in my work with children at Splash Centre.
- I understand that breaches of this Code may result in disciplinary action, including termination and referral to the Reportable Conduct Scheme.
- I understand my mandatory reporting obligations and my obligations under the NSW Child Safe Standards.
- I hold a current Working with Children Check and will notify the Director immediately if my WWCC status changes.

Full Name (Print)	
Signature	
Position	
WWCC Number	
WWCC Expiry Date	
Date	

This signed form is to be retained by the Director in the staff personnel file.

Appendix C ACECQA Compliance Checklist

Complete this checklist before this Code is approved.

Policy checklist

Checklist item	Where addressed / status
Have you referenced the relevant regulations and are these reflected in the policy?	YES section 4
Does the title provide a clear and concise statement identifying the intent of the policy?	YES
Have you checked the policy requirements and referenced related legislation that applies to your service type (OSHC, NSW)?	YES
Does your policy statement provide a framework for child-safe decision-making and ensure consistent practice?	YES
Does your policy statement reflect Splash Centre's philosophy?	YES
Is it clear why this policy exists?	YES

Procedure checklist

Checklist item	Where addressed / status
Do the procedures align with the policy?	YES
Have the procedures been written in plain English and can they be easily implemented by an educator new to the service?	YES
Is it clear who is responsible for implementation?	YES section B.4
Are all educators and staff aware of the procedures and able to implement them?	YES section A.8