

SYDNEY BUSH DANCES



CHILD SAFE POLICY & SAFEGUARDING PROCEDURES

Sydney Bush Dances
ABN 61 351 289 350
NSW School Incursion Provider

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Policy Owner: Caleb Anderson (Director)

IMPORTANT IMPLEMENTATION NOTE

This policy establishes the child-safety standards and procedures adopted by **Sydney Bush Dances** when providing services to children and young people in NSW schools. It has been drafted with reference to the **NSW Child Safe Standards**, the **Children's Guardian Act 2019 (NSW)**, NSW child-protection reporting requirements and applicable privacy principles.

The NSW Office of the Children's Guardian states that the Child Safe Standards are designed to create organisational cultures in which child safety is prioritised, concerns are taken seriously, and abuse is prevented, detected and responded to.

This policy should be read together with policies of an individual school, including applicable procedures for:

- Child Safe Code of Conduct;
- Child Protection & Reporting Procedure;
- Risk Management Planning;
- Incident Management Procedures;
- the Privacy Policies; and
- applicable NSW legislation and regulatory guidance.

This document does not itself guarantee legal compliance. Sydney Bush Dances must ensure that the procedures described here are implemented and that all required screening, training, insurance, recordkeeping and reporting obligations are met.

1. DEFINITIONS AND INTERPRETATION

1.1. Definitions

In this policy, unless the context otherwise requires:

- 1.1.1. **Abuse** means any act, or failure to act, that results in, or is likely to result in, harm to a child, including physical abuse, sexual abuse, emotional or psychological abuse, and neglect.
- 1.1.2. **Allegation** means an assertion, whether made formally or informally, that a person has engaged in conduct that may constitute Abuse, Grooming or another breach of this policy or the Code of Conduct.
- 1.1.3. **Child** or **Children** means a person or persons under the age of 18 years, and includes the terms "young person" and "student" where those terms are used interchangeably in this policy.
- 1.1.4. **Child Safe Scheme** means the scheme established under the *Children's Guardian Act 2019* (NSW) and administered by the NSW Office of the Children's Guardian.
- 1.1.5. **Child Safe Standards** or **the Standards** means the 10 Child Safe Standards published by the NSW Office of the Children's Guardian under the Child Safe Scheme, as amended or replaced from time to time.
- 1.1.6. **Child Safety Contact** means the person named in Section 31 (or any successor provision) as responsible for receiving and coordinating the escalation of internal child-safety concerns.
- 1.1.7. **Code of Conduct** means the Child Safe Code of Conduct set out in Section 10 of this policy.
- 1.1.8. **Complaint** means an expression of dissatisfaction, concern or Allegation made to or about Sydney Bush Dances or its Personnel, whether or not it relates to a child-safety matter.
- 1.1.9. **Disclosure** means a statement made by a child, whether spontaneously or in response to a question, indicating that they have experienced or are at risk of Abuse, neglect or another form of harm.
- 1.1.10. **Grooming** means conduct engaged in with the intention of making it easier to procure a child for sexual activity, including behaviour intended to establish trust with, or reduce the inhibitions of, a child or their family.
- 1.1.11. **Mandatory Reporter** means a person who is required, under section 27 of the *Children and Young Persons (Care and Protection) Act 1998* (NSW), to make a report to the NSW Child Protection Helpline where they hold a reportable belief on reasonable grounds that a child is at risk of significant harm.
- 1.1.12. **Organisation, Sydney Bush Dances, we, us and our** means Sydney Bush Dances and, where the context requires, its Owner/Director, employees, contractors and Personnel collectively.
- 1.1.13. **Personal Information** has the meaning given in the applicable privacy legislation referred to in Section 20 of this policy, and generally means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

- 1.1.14. **Personnel** means all persons engaged by Sydney Bush Dances in connection with child-related services, as described in Section 2 (Scope) of this policy, including directors, employees, casual employees, contractors, performers, musicians, instructors, facilitators and volunteers.
 - 1.1.15. **Policy** or **this Policy** means this Child Safe Policy & Safeguarding Procedures document, as amended or replaced from time to time.
 - 1.1.16. **Privacy Contact** means the person named in Section 31 (or any successor provision) as responsible for privacy enquiries, complaints and suspected breaches.
 - 1.1.17. **Program** means any school incursion, workshop, performance, educational program, music program, dance program or related activity delivered by Sydney Bush Dances.
 - 1.1.18. **Reportable Conduct** and **Reportable Conduct Scheme** have the meaning given under Part 3A of the *Children's Guardian Act 2019* (NSW).
 - 1.1.19. **Reasonably Practicable**, in relation to an obligation under this policy, means practicable having regard to the nature of the activity, the resources reasonably available to Sydney Bush Dances, and the degree of risk involved.
 - 1.1.20. **Risk of Significant Harm** has the meaning given in the *Children and Young Persons (Care and Protection) Act 1998* (NSW).
 - 1.1.21. **School** means the NSW school or other educational institution engaging Sydney Bush Dances to deliver a Program.
 - 1.1.22. **Sensitive Information** has the meaning given in the applicable privacy legislation referred to in Section 20 of this policy, and generally includes information about a person's health, disability, or racial or ethnic origin.
 - 1.1.23. **Working With Children Check** or **WWCC** means a clearance issued under the *Child Protection (Working with Children) Act 2012* (NSW).
 - 1.2. **Interpretation**

In this policy, unless the context otherwise requires:

 - 1.2.1. Headings are for convenience only and do not affect interpretation;
 - 1.2.2. The singular includes the plural and vice versa;
 - 1.2.3. A reference to a person includes an individual, a body corporate, and an unincorporated body;
 - 1.2.4. A reference to legislation includes regulations and other instruments made under it, and a reference to legislation or a provision includes that legislation or provision as amended, re-enacted or replaced;
 - 1.2.5. The words "include," "includes" and "including" are not words of limitation;
 - 1.2.6. A reference to writing includes email and other electronic communication;
 - 1.2.7. A reference to "day" means a calendar day unless stated otherwise;
 - 1.2.8. If there is an inconsistency between this policy and a policy or procedure of a School, the requirement that provides the higher level of protection to children applies, unless doing so would place Sydney Bush Dances in breach of an applicable law; and

- 1.2.9. This policy should be read together with the NSW legislation, standards and guidance material referred to in Section 34 (NSW Reference Material), as those materials are amended or replaced from time to time.

2. PURPOSE

Sydney Bush Dances is committed to creating environments in which children and young people are:

- safe from abuse, neglect and other forms of harm;
- treated with dignity and respect;
- listened to and taken seriously;
- encouraged to express their views and concerns; and
- able to participate in our programs in a safe and supportive environment.

This policy establishes the minimum standards expected of Sydney Bush Dances when delivering school incursions, workshops, performances, educational programs, music programs, dance programs and related activities.

3. SCOPE

This policy applies to all persons engaged by Sydney Bush Dances in connection with child-related services, including:

- 3.1. Directors and owners;
- 3.2. Employees;
- 3.3. Casual employees
- 3.4. Contractors
- 3.5. Performers
- 3.6. Musicians
- 3.7. Instructors
- 3.8. Facilitators
- 3.9. Volunteers; and
- 3.10. any other person authorised to participate in the delivery of a program involving children. Where a school imposes additional child-safety requirements, Personnel will comply with those requirements where they are applicable.

4. RECRUITMENT, SCREENING AND WORKING WITH CHILDREN CHECKS

Sydney Bush Dances is committed to ensuring that only suitable persons are engaged to deliver child-related services. Before a person is engaged as Personnel to deliver, or assist in delivering, a Program, Sydney Bush Dances will:

- 4.1. Verify that the person holds a current Working With Children Check (WWCC) issued under the *Child Protection (Working with Children) Act 2012* (NSW), where required for their role;
- 4.2. Sight and record the WWCC clearance number and expiry date;
- 4.3. Conduct reasonable identity verification;
- 4.4. Seek relevant referee checks where practicable; and
- 4.5. Provide the person with a copy of this policy and the Code of Conduct, and require them to confirm they have read and understood it.

Sydney Bush Dances will not engage a person in child-related work where:

- 4.6. The person does not hold a required, current WWCC;

4.7. The person is a "disqualified person" under the *Child Protection (Working with Children) Act 2012* (NSW); or

4.8. Sydney Bush Dances becomes aware of information that raises a genuine concern about the person's suitability to work with children.

WWCC clearances will be re-verified periodically and prior to expiry. Personnel must notify Sydney Bush Dances immediately if their WWCC is cancelled, suspended, refused or made subject to an interim bar.

5. TRAINING, INDUCTION AND ONGOING DEVELOPMENT

All Personnel will complete a child-safety induction before independently delivering a Program. Induction will cover, at minimum:

- 5.1. This policy and the Code of Conduct;
- 5.2. How to recognise indicators of Abuse, neglect and Grooming;
- 5.3. How to respond to a Disclosure;
- 5.4. The reporting process set out in Section 12;
- 5.5. Mandatory reporting obligations under NSW law; and
- 5.6. Professional boundaries, physical contact, and online communication requirements.

Sydney Bush Dances will:

- 5.7. Refresh child-safety training at least annually, or sooner following a significant incident, complaint or legislative change;
- 5.8. Keep a record of training completed by each member of Personnel; and
- 5.9. Provide practical guidance and, where appropriate, scenario-based training to help Personnel develop confidence in responding to disclosures and concerns.

6. CHILD SAFE COMMITMENT

Sydney Bush Dances publicly commits to the safety and wellbeing of children and young people.

Our organisation recognises that child safety is a shared responsibility.

We therefore commit to:

- 6.1. Putting the safety and wellbeing of children ahead of commercial or organisational interests;
- 6.2. Maintaining professional boundaries between personnel and students;
- 6.3. Providing children with appropriate opportunities to express their views;
- 6.4. Taking complaints and concerns seriously
- 6.5. Identifying and managing risks associated with our activities
- 6.6. Responding appropriately to disclosures and allegations
- 6.7. Maintaining appropriate privacy and information practises
- 6.8. Providing personnel with appropriate child-safety information and training
- 6.9. Cooperating with schools and relevant authorities
- 6.10. Continually reviewing and improving our child safety practises

These commitments reflect the approach of the NSW Child Safe Standards, which emphasise leadership, children's participation, risk management, appropriate behaviour, complaints handling, training, safe physical and online environments and continuous improvement.

7. CHILD PARTICIPATION AND EMPOWERMENT

Children and young people have the right to have their views heard and taken seriously. When delivering programs, Sydney Bush Dances will:

- 7.1. Communicate with children in an age-appropriate manner;

- 7.2. Explain activities clearly;
- 7.3. Encourage students to ask questions;
- 7.4. Provide reasonable opportunities for students to express concerns;
- 7.5. Avoid coercion or humiliation by any means reasonably appropriate;
- 7.6. Take concerns raised by students seriously; and
- 7.7. Provide students with access to an appropriate trusted adult where they wished to raise a concern.

Children will not be punished, humiliated or disadvantaged for raising a genuine safety concern. The NSW Child Safe Standards expressly require organisations to provide children with opportunities to express their views and to facilitate child-friendly ways of communicating concerns.

8. FAMILY AND COMMUNITY ENGAGEMENT

Sydney Bush Dances recognises that families and communities have the primary responsibility for the upbringing of their children, and that open communication supports child safety. Sydney Bush Dances will:

- 8.1. Make this policy available to a School on request, for the School to share with families as it considers appropriate;
- 8.2. Provide clear information to Schools about the nature of a Program before it is delivered, so that Schools can inform families and address any questions;
- 8.3. Respond openly to reasonable questions from a School about our child-safety practices, screening or insurance arrangements;
- 8.4. Provide accessible ways for a parent, guardian or community member to raise a concern, including through the contacts listed in Section 31; and
- 8.5. Have regard to reasonable feedback from families and communities when reviewing this policy under Section 32.

9. CULTURAL SAFETY, INCLUSION AND ACCESSIBILITY

Sydney Bush Dances is committed to providing programs that are inclusive, respectful and accessible. We will seek to ensure that children are treated fairly regardless of:

- 9.1. Disability;
- 9.2. Cultural Background;
- 9.3. Language;
- 9.4. Family circumstances;
- 9.5. Gender;
- 9.6. Age; or
- 9.7. Other personal characteristics.
- 9.8. Program facilitators will respect reasonable adjustments requested by a school where those adjustments are reasonably practicable and consistent with the safety of participants. Discrimination, bullying, harassment and degrading treatment are not acceptable.

In addition to the commitments in Section 5, Sydney Bush Dances will pay particular attention to:

- 9.9. The cultural safety of Aboriginal and Torres Strait Islander children, including by engaging respectfully with cultural protocols where known and reasonably practicable;
- 9.10. The needs of children with disability, including by seeking guidance from the School on reasonable adjustments before the Program is delivered; and

- 9.11. The needs of children from culturally and linguistically diverse backgrounds, including by using clear, plain-English communication and, where necessary, deferring to School staff for language support.

Sydney Bush Dances acknowledges that these groups may face additional barriers to raising a safety concern, and will take this into account when applying Section 4 (Child Participation and Empowerment) and Section 30 (Complaints About Child Safety).

10. PROFESSIONAL BOUNDARIES

All Personnel will maintain appropriate professional boundaries with students.

Personnel will:

- 10.1. Interact with students in a professional and age-appropriate manner;
- 10.2. Remain within the approved scope of the program;
- 10.3. Follow reasonable directions given by school staff;
- 10.4. Avoid unnecessary one-to-one interactions;
- 10.5. Avoid unnecessary physical contact;
- 10.6. Use appropriate language;
- 10.7. Avoid favouritism; and
- 10.8. Report concerns about inappropriate conduct.

Where reasonably practicable, school staff should remain present during the delivery of programs and retain responsibility for student supervision and behaviour management.

11. PHYSICAL CONTACT

Physical contact with students should generally be avoided unless it is reasonably necessary for the activity, safety or an appropriate educational purpose.

Where physical contact is necessary, it must be:

- 11.1. Appropriate to the activity;
- 11.2. Proportionate;
- 11.3. Respectful;
- 11.4. Non-sexual;
- 11.5. Transparent; and
- 11.6. Consistent with the school's physical contact policies.

Personnel will never use physical contact as punishment, intimidation, humiliation or entertainment. Where an activity involves demonstrations of dance, movement or other physical techniques, facilitators should use non-contact demonstrations wherever reasonably practicable.

12. ONLINE COMMUNICATION AND SOCIAL MEDIA

Personnel will maintain professional boundaries when communicating electronically with students. Personnel will not:

- 12.1. Privately message students using social media accounts;
- 12.2. Add students to personal social media accounts;
- 12.3. Exchange personal contact details with students without an authorised organisational purpose;
- 12.4. Communicate with students through disappearing-message services such as Snapchat;
- 12.5. Send inappropriate images or material to students;
- 12.6. Request inappropriate images from students; or
- 12.7. Publish information about students without appropriate authorisation.

Any electronic communication required for the delivery of a program should occur through authorised business or school channels wherever practicable.

13. PHOTOGRAPHY AND RECORDING

Sydney Bush Dances will comply with the school's requirements concerning photography and recording. Personnel will not photograph, film or record students for personal or promotional purposes unless the necessary permission and consent has been obtained through the appropriate school/business process. Student photographs or recordings must not be:

- 13.1. Uploaded to personal social-media accounts;
- 13.2. Distributed to unauthorised persons;
- 13.3. Retained unnecessarily; or
- 13.4. Used for advertising without appropriate authorisation.

Where a school prohibits photography or recording, Sydney Bush Dances will comply with that prohibition.

14. CHILD SAFE CODE OF CONDUCT

The following Code of Conduct applies to all personnel.

14.1. Personnel will:

- i. put children's safety and wellbeing first;
- ii. treat students with dignity and respect;
- iii. use age-appropriate language;
- iv. maintain professional boundaries;
- v. follow school rules and reasonable directions;
- vi. comply with relevant risk controls;
- vii. report child-safety concerns;
- viii. respond appropriately to disclosures;
- ix. protect confidential information;
- x. use appropriate communication channels;
- xi. behave professionally at all times; and
- xii. cooperate with legitimate safeguarding processes.

14.2. Personnel will not:

- i. engage in sexualised conduct with a child;
- ii. engage in grooming behaviour;
- iii. use sexually suggestive or inappropriate language;
- iv. humiliate, threaten or intimidate a student;
- v. use corporal punishment;
- vi. use unnecessary physical force;
- vii. engage in unnecessary physical contact;
- viii. deliberately isolate a student;
- ix. invite students to private residences;
- x. transport students in private vehicles without appropriate authorisation;
- xi. exchange personal social-media details with students;
- xii. request inappropriate photographs;
- xiii. provide alcohol, drugs, tobacco or vaping products to students;
- xiv. conceal a child-safety concern;
- xv. discourage a student from making a complaint; or
- xvi. promise a student that information will be kept secret.

15. CHILD PROTECTION & REPORTING PROCEDURE

15.1. Purpose

This procedure establishes how Sydney Bush Dances responds when a person becomes concerned that a child may have experienced, or be at risk of experiencing:

- i. abuse;
- ii. neglect;
- iii. exploitation;
- iv. grooming;
- v. inappropriate conduct;
- vi. physical harm;
- vii. sexual harm;
- viii. psychological harm; or
- ix. another significant safety or wellbeing concern.

15.2. Immediate danger

If a child appears to be in immediate danger: **CALL 000**.

Personnel should then notify the supervising school staff member as soon as it is safe and appropriate to do so. Personnel will not place themselves or another child at unnecessary risk when responding to an emergency.

15.3. When a child makes a disclosure

If a child tells a facilitator that they have been harmed or are concerned about their safety, the facilitator should:

- i. remain calm;
- ii. listen carefully;
- iii. take the child seriously;
- iv. avoid expressing disbelief or shock;
- v. avoid investigating the allegation;
- vi. avoid asking leading or unnecessary questions;
- vii. not promise confidentiality or secrecy;
- viii. reassure the child that they have done the right thing by speaking up;
- ix. record the relevant facts as soon as practicable; and
- x. follow the reporting process below.

A facilitator should not attempt to determine whether an allegation is true.

16. REPORTING PROCESS

Where a child-safety concern arises, personnel should follow these steps:

Step 1 — Ensure immediate safety

Determine whether the child or another person is in immediate danger.

If so, call **000**.

Step 2 — Notify the school

Where appropriate, notify the supervising teacher, principal or nominated school contact.

This should occur consistently with applicable reporting obligations and the school's child-protection procedures.

Step 3 — Internal notification

Notify:

Child Safety Contact: [NAME]

Position: [POSITION]

Phone: [PHONE]

Email: [EMAIL]

as soon as practicable.

Step 4 — Consider external reporting obligations

Where the circumstances trigger a statutory reporting obligation, the relevant person must make the required report.

An internal report to Sydney Bush Dances does not necessarily discharge a person's own legal reporting obligation.

17. MANDATORY REPORTING

Certain persons in NSW are mandatory reporters under the **Children and Young Persons (Care and Protection) Act 1998 (NSW)**.

Mandatory reporters must make a report to the NSW Child Protection Helpline where the statutory threshold is met.

The NSW Mandatory Reporter Guide assists mandatory reporters in determining whether a report concerning a child at risk of significant harm should be made.

NSW Child Protection Helpline

13 21 11

The organisation recognises that:

A person's legal reporting obligation must be assessed according to their individual circumstances and statutory obligations.

Accordingly, Personnel will not assume that notifying Sydney Bush Dances or a school is sufficient where the law requires an individual to make a report.

18. REPORTABLE CONDUCT

Where an allegation concerns conduct by a worker that may fall within the NSW Reportable Conduct Scheme, Sydney Bush Dances will assess the matter and take any action required by applicable law.

The organisation will:

- 18.1. Promptly escalate all relevant allegations;
- 18.2. Preserve relevant records;
- 18.3. Avoid unnecessary disclosure of information;
- 18.4. Cooperate with relevant authorities;
- 18.5. Obtain professional legal advice where appropriate; and
- 18.6. avoid conducting an informal investigation where doing so could interfere with a statutory investigation.

19. RECORDING CHILD-SAFETY CONCERNS

Where a child-safety concern arises, Sydney Bush Dances will maintain an appropriate record. Records should include, where known:

- 19.1. Date;
- 19.2. Time;
- 19.3. Location;
- 19.4. Persons involved;
- 19.5. What was observed;
- 19.6. What was said;
- 19.7. Actions taken;
- 19.8. Who was notified;
- 19.9. Any relevant school instructions; and
- 19.10. Any external report made.

Records must be factual.

Personnel should distinguish between personal observations and reported observations wherever possible. Records must be stored securely and access restricted to authorised persons.

20. CONFIDENTIALITY

Child-safety information must be treated sensitively.

Personnel will not discuss allegations or concerns with people who do not have a legitimate reason to receive the information. However, confidentiality does **not** prevent information being disclosed where disclosure is:

- 20.1. Required by law;
- 20.2. Necessary to protect a child;
- 20.3. Required for lawful investigation;
- 20.4. Authorised by an appropriate person; or
- 20.5. Otherwise permitted by applicable law.

Personnel will never promise a child that a disclosure will remain secret.

21. VICTIMISATION

Sydney Bush Dances does not tolerate retaliation against a child, parent, school employee, contractor or other person who raises a genuine safety concern.

A person who raises a concern in good faith will not be disadvantaged merely because the concern is ultimately unable to be substantiated.

22. RISK MANAGEMENT PLAN

Sydney Bush Dances will identify and manage foreseeable risks to children arising from its activities. Risk assessments should consider:

- 22.1. Physical activities;
- 22.2. Movement and dancing;
- 22.3. Musical instruments;
- 22.4. Electrical equipment;
- 22.5. Trip hazards;
- 22.6. Venue layout;
- 22.7. Noise;
- 22.8. The number of students;
- 22.9. Accessibility;
- 22.10. Supervision;
- 22.11. Interactions between personnel and students;
- 22.12. Photography and recording;
- 22.13. Online environments;
- 22.14. Emergency procedures; and
- 22.15. Any activity-specific hazards.

Risk controls must be reviewed when a new activity is introduced, the venue changes, an incident occurs, a significant complaint is received; or circumstances otherwise change.

Risk management is an express component of the NSW Child Safe Standards.

23. INCIDENT MANAGEMENT

Where an incident occurs during a program, Personnel will:

- 23.1. Stop or modify the activity where necessary;
- 23.2. Ensure immediate safety;

- 23.3. Notify the supervising staff member;
- 23.4. Provide or obtain appropriate first aid emergency assistance where necessary;
- 23.5. Follow the school's emergency procedures;
- 23.6. Notify Sydney Bush Dances' designated contact;
- 23.7. Document the incident; and
- 23.8. Review whether the activity or risk control needs to change.

We acknowledge that serious child-safety incidents must be escalated immediately.

24. PRIVACY POLICY

Sydney Bush Dances respects the privacy of students, parents/guardians, school employees and other individuals whose personal information it handles.

This Privacy Policy explains how Sydney Bush Dances collects, uses, stores and discloses personal information in connection with school programs.

The privacy laws applying to a private school-incursion provider can differ depending on the organisation's structure, activities, turnover and contractual arrangements. The **NSW Privacy and Personal Information Protection Act 1998** principally regulates NSW public-sector agencies, rather than every private business.

Where Sydney Bush Dances is subject to the **Privacy Act 1988 (Cth)** and Australian Privacy Principles, those obligations will also apply.

25. INFORMATION WE MAY COLLECT

Depending on the service, Sydney Bush Dances may collect:

- 25.1. School contact information;
- 25.2. Teacher and administration contact details;
- 25.3. Booking information;
- 25.4. Program requirements;
- 25.5. Numbers of students attending;
- 25.6. Accessibility requirements;
- 25.7. Relevant safety information;
- 25.8. Complaint information;
- 25.9. Payment and invoicing information; and
- 25.10. Information necessary to administer the business relationship.

We will seek to avoid collecting personal information about individual students unless it is reasonably necessary for the safe and effective delivery of the service.

26. DATA MINIMISATION

Sydney Bush Dances will seek to collect only information reasonably necessary for:

- 26.1. Delivering the program;
- 26.2. Ensuring participant safety;
- 26.3. Accommodating relevant accessibility needs;
- 26.4. Managing incidents;
- 26.5. Responding to complaints;
- 26.6. Fulfilling contractual obligations; or
- 26.7. Complying with legal requirements.

Schools should not provide detailed student information unless it is reasonably necessary for the program.

27. HOW WE USE PERSONAL INFORMATION

Personal information may be used to:

- 27.1. Organise school programs;

- 27.2. Communicate with schools;
- 27.3. Provide services;
- 27.4. Respond to safety issues;
- 27.5. Manage incidents;
- 27.6. Respond to complaints;
- 27.7. Administer bookings or payments;
- 27.8. Comply with legal obligations;
- 27.9. Maintain appropriate business records; and
- 27.10. Improve our services.

We will not use student information for unrelated marketing purposes without appropriate authority.

28. DISCLOSURE OF INFORMATION

Sydney Bush Dances will not sell student personal information. Information may be disclosed where reasonably necessary:

- 28.1. To the school;
- 28.2. To authorised personnel;
- 28.3. To service providers assisting with the program;
- 28.4. To insurers;
- 28.5. To professional advisers;
- 28.6. To emergency services;
- 28.7. To child-protection authorities;
- 28.8. To law-enforcement agencies; or
- 28.9. Where otherwise required or authorised by law.

Information will only be disclosed to the extent reasonably necessary for the relevant purpose.

29. SECURITY

Sydney Bush Dances will take reasonable steps to protect personal information against:

- 29.1. Unauthorised access;
- 29.2. Loss;
- 29.3. Misuse;
- 29.4. Alteration;
- 29.5. Disclosure; and
- 29.6. Destruction.

Where practicable:

- 29.7. Electronic records will be stored in password-protected systems;
- 29.8. Access will be restricted to authorised personnel;
- 29.9. Paper records will be securely stored;
- 29.10. Sensitive information will not be left unattended; and
- 29.11. Information will not be unnecessarily copied or distributed.

Any suspected privacy breach must be reported to:

Privacy Contact: Caleb Anderson

Email: andecal@icloud.com

Phone: 0416 530 971

The organisation will assess whether further action or notification is required.

30. PHOTOGRAPHS AND STUDENT INFORMATION

Student photographs, videos and recordings must only be taken or used in accordance with the applicable school requirements and appropriate consent/authorisation. Personnel will not independently obtain student photographs for personal use. Where promotional material is created, Sydney Bush Dances will ensure that the relevant permissions have been obtained before publication.

31. RETENTION AND DESTRUCTION

Sydney Bush Dances will retain personal information only for as long as reasonably necessary for:

- 31.1. The purpose for which it was collected;
- 31.2. Legal obligations;
- 31.3. Contractual obligations;
- 31.4. Insurance;
- 31.5. Safeguarding;
- 31.6. Dispute resolution; or
- 31.7. Legitimate Business recordkeeping.

When information is no longer required, it will be securely destroyed or de-identified where appropriate. Any statutory or contractual retention requirement takes precedence.

32. ACCESS AND CORRECTION

Individuals may contact Sydney Bush Dances to request information about personal information held about them and, where applicable, request correction of inaccurate information.

Requests should be directed to:

Privacy Contact: Caleb Anderson

Email: sydneybushdances@outlook.com

Requests will be handled in accordance with applicable privacy laws and any relevant contractual or legal restrictions.

33. PRIVACY COMPLAINTS

A privacy complaint may be made to:

Sydney Bush Dances

Email: sydneybushdances@outlook.com

Phone: 0416 530 971

The organisation will assess and respond to complaints within a reasonable period. Where a complaint concerns an organisation or agency regulated by NSW privacy legislation, the complainant may also have rights to contact the NSW Information and Privacy Commission. The IPC explains that the NSW privacy framework includes the **Privacy and Personal Information Protection Act 1998** and the **Health Records and Information Privacy Act 2002**.

34. COMPLAINTS ABOUT CHILD SAFETY

Sydney Bush Dances encourages children, parents/guardians, school employees and other stakeholders to raise concerns.

Complaints involving possible:

- 34.1. Abuse;
- 34.2. Neglect;
- 34.3. Grooming;
- 34.4. Sexual misconduct;

- 34.5. Serious inappropriate conduct; or
 34.6. Other significant child-safety concerns
 must be treated as child-safety matters and escalated under this policy rather than
 treated solely as ordinary customer-service complaints. The organisation will:
 34.7. Take the complaint seriously;
 34.8. Prioritise the child's safety;
 34.9. Respond promptly;
 34.10. Protect Relevant information;
 34.11. Comply with applicable reporting obligations;
 34.12. Avoid unnecessary investigation by unqualified personnel; and
 34.13. Review whether organisational improvements are required.
 The NSW Child Safe Standards specifically require child-focused complaint-
 handling systems and prompt responses to complaints.

35. GOVERNANCE AND RESPONSIBILITIES

Role	Responsibility
Owner/Director	Overall responsibility for implementing and reviewing child-safe practices
Child Safety Contact	Receives internal concerns and coordinates appropriate escalation
Program Facilitator	Follows the Code of Conduct, manages activity risks and reports concerns
Privacy Contact	Manages privacy enquiries, complaints and suspected breaches
All Personnel	Follow this policy and immediately raise child-safety concerns

Named contacts

Business Owner/Director:

Caleb Anderson – andecal@icloud.com

Child Safety Contact:

Caleb Anderson – andecal@icloud.com

Privacy Contact:

Caleb Anderson – andecal@icloud.com

Emergency:

000

NSW Child Protection Helpline:

13 21 11

36. REVIEW AND CONTINUOUS IMPROVEMENT

This policy will be reviewed:

- 36.1. At least annually;
 36.2. Following a serious incident;
 36.3. Following a significant complaint;
 36.4. Following a material change of the organisation's services;
 36.5. Following relevant legislative or regulatory changes; or
 36.6. Whenever management considers a review necessary.

The organisation will use complaints, incidents, feedback and experience from program delivery to identify opportunities to improve child safety. The NSW Child Safe Standards specifically require organisations to continuously review and improve their child-safe practices.

37. CHILD-SAFE QUICK REFERENCE

IF YOU ARE WORRIED ABOUT A CHILD:

1. Is there immediate danger?
→ Call 000.
2. Listen and take the child seriously.
3. Do not investigate.
4. Do not promise secrecy.
5. Notify the appropriate school contact where appropriate.
6. Notify [CHILD SAFETY CONTACT].
7. Consider whether you have an individual mandatory reporting obligation.
8. Where applicable, use the NSW Mandatory Reporter Guide.
9. Make any required report to the NSW Child Protection Helpline — 13 21 11.
10. Record the facts securely.

38. NSW REFERENCE MATERIAL

This policy should be maintained against the current versions of the following:

- **NSW Office of the Children's Guardian — Child Safe Standards**
- **NSW Office of the Children's Guardian — Child Safe Scheme**
- **NSW Office of the Children's Guardian — Implementing the Child Safe Standards**
- **NSW Department of Communities and Justice — Mandatory Reporter Guide**
- **NSW Information and Privacy Commission — NSW Privacy Laws**
- **NSW Privacy and Personal Information Protection Act 1998**
- **NSW Children and Young Persons (Care and Protection) Act 1998**
- **NSW Children's Guardian Act 2019**
- **Privacy Act 1988 (Cth), where applicable.**