Child Safe Code of Conduct

July 2026

Authorisation

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Peter Saccasan	7 August 2026	7 August 2026	7 August 2027

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1 Purpose

This *Child Safe Code of Conduct* outlines the standards of behaviour expected of personnel when interacting with children and young people at Education Development Association (EDA).

2 Scope

This Code of Conduct extends to EDA's child-related activities and programs. It applies to the following individuals:

- Employees
- Residents
- Third parties
- Volunteers.

(collectively referred to as 'personnel' in this Code of Conduct).

3 Terms and Definitions

For the purposes of this Code of Conduct:

Term	Mean
CALD	Refers to Culturally and Linguistically Diverse (CALD).
Centre	Refers to a study centre established by EDA in which its educational activities are conducted.
Child	Refers to a person under the age of 18 years, unless under the law applicable to the child, majority is attained earlier.
Child abuse	Refers to the acts or omissions (neglect) that result in, or have the likelihood to result in, harm to a child. The forms of child abuse are sexual abuse, emotional abuse, neglect, physical abuse, and exposure to family violence.
Child Safeguarding Officer	Refers to the individual appointed by EDA who is responsible for matters relating to child safety, including the management of child safety complaints.
Company owned digital device	Refers to any digital device that is purchased, owned, or issued by EDA for authorised business or operational use.
Digital device	Refers to any digital device that can take images or videos, such as mobile phones, digital cameras, tablets, smart watches and other new

	and emerging technologies, where those technologies have image taking or video record capability.
EDA	Refers to Education Development Association.
Employee	Refers to an individual in a paid position at EDA.
Helper	Refers to a person invited to help from time to time in a particular activity at a Centre. A helper may be a person under 18 years or over 18 years of age.
Leader	Refers to an adult who has an ongoing role in the provision of services in a Centre.
Officer	Refers to the meaning given by the *Corporations Act 2001* (Cth) and includes a director or secretary of EDA.
Personal digital device	Refers to any digital device that is privately owned by an individual.
Principal	Refers to a person appointed by EDA to direct activities at a Centre.
Third party	Refers to an individual or entity engaged by EDA on a temporary basis, including but not limited to a: ● Contractor ● Tradesperson ● Sub-contractor ● Supplier.
Volunteer	Refers to an individual in an unpaid position at EDA. This includes EDA Officers, Leaders and Helpers, and may include Principals and Residents. It also includes other individuals engaged by EDA on a voluntary basis, such as parent volunteers.

4 Responsibilities

Personnel are required to:

- ✔ Comply with EDA's child safe policies and procedures, as applicable to their position
- ✔ Report suspicions, concerns, allegations, or disclosures of abuse in accordance with EDA's *Child Safe Complaints Handling Procedure*
- ✔ Report breaches of this Code of Conduct to EDA's Child Safeguarding Officer
- ✔ Comply with child safe legal obligations as applicable in the Centre's State or Territory of operation
- ✔ Listen and respond appropriately to a child if they raise a safety concern
- ✔ Be vigilant to possible signs of abuse and trauma in children
- ✔ Foster an inclusive environment for all children, including those with disabilities, from CALD backgrounds and First Nations children
- ✔ Uphold and apply trauma-informed principles when interacting with all children. Principles include *safety, trustworthiness, choice, collaboration, and empowerment.*

5 Appropriate and Inappropriate Behaviours

This section outlines appropriate and inappropriate behaviours for personnel when interacting with children.

5.1 Professional Boundaries

Personnel are required to:

✔ Interact with children in accordance with the scope of their role and responsibilities.

Personnel must not:

- Spend time alone with a child outside of EDA programs
- Develop a close personal relationship with a child outside of EDA programs
- Ask a child to keep secrets, such as asking them not to disclose interactions to a parent/guardian
- Allow bullying to occur between children
- Show a child special attention or isolate them from peers to engage in inappropriate behaviour
- Buy gifts or other items for children without authorisation from a Principal or EDA's Child Safeguarding Officer, and the knowledge of the child's parents/guardians
- Allow a child to leave the Centre, excursion or other off-site activity with an unsafe adult, especially in custody matters
- Supply children with alcohol, drugs, tobacco, or pornography
- Be under the influence of any alcohol, illicit drugs, medication, or fatigue that may affect their capacity to perform their role.

5.2. Communication

Personnel are required to:

✔ Use clear, direct, and age-appropriate language

✔ Listen to and respect what children have to say

✔ Use respectful and positive language that creates a fun and inclusive environment

✔ Promote positive friendships and encourage children to support their peers

✔ Address a situation when negative language or tone is be used by a child, parent/guardian or other person and reinforce that it is not appropriate

✔ Facilitate mentor sessions in a professional manner, and ensure that:

- Discussions are age-appropriate and developmentally suitable

- Where appropriate, provide educational resources and referrals to support services, such as eSafety Commissioner and Kids Helpline.

✔ Inform the Child Safeguarding Officer if a child seeks to establish contact, communication, or a relationship that is unrelated to their role with EDA

✔ Communicate with children and their parents through authorised EDA communication channels and in accordance with the follow requirements:

1. Use authorised WhatsApp groups as the primary method of communication with children and their parents. Authorised WhatsApp groups:
   - Are approved by the Centre Principal
   - Have parent/guardian consent
   - Include a minimum of two authorised EDA personnel.

2. Direct one-to-one communication with a child is permitted only where:
   - Communication through an authorised WhatsApp group is not reasonably practicable; and
   - The communication is necessary for logistical, safety, or emergency purposes relating to EDA activities. Examples include to:
     - Confirm attendance at an activity
     - Advise of schedule or activity changes
     - Confirm transport, collection, or arrival arrangements
     - Respond to an immediate safety concern or emergency.

3. Where a child initiates direct contact, personnel are required to:
   - Limit their response to the relevant EDA-related purpose; and
   - Redirect future communication to the authorised WhatsApp group.

Personnel must not:

 Engage in direct one-to-one communication with a child outside of an authorised EDA communication channel (including online)

 Use abusive, derogatory, racist, offensive, threatening or sexual language when communicating with a child

 Share personal or confidential information about children or their families without prior informed consent

 Have open discussions with other adults about inappropriate adult themes in the presence of children

 Use sexually graphic, explicit or unnecessary detail when providing mentor support

 Share personal experiences or opinions related to sexually explicit themes.

5.3. Supervision

Personnel are required to:

- ✔ Ensure there is always a minimum of two authorised EDA personnel present to supervise Centre activities to minimise opportunities for adults and children to be in 1:1 unsupervised settings
- ✔ Conduct peer mentoring sessions in an open area that is accessible and visible to another supervising employee/volunteer at all times.
- ✔ Ensure there are appropriate supervision ratios based on the age and gender of the children and size of the group. A risk assessment must be completed for each EDA activity/program to determine appropriate ratios. As a minimum, there should always be two authorised EDA personnel present.
- ✔ Remain readily accessible and within sight of other personnel while interact with children
- ✔ Engage with children in areas that have clear visibility
- ✔ Ensure children are always supervised when using shared spaces / common areas at a Centre
- ✔ Be vigilant in supervising and monitoring students when using mobile phones.

  Children are not permitted to use mobile phones:
  - During EDA supervised activities
  - In the toilets, change rooms or swimming pool areas
  - To photograph or video their peers or personnel without the individual's consent
  - To bully, harass or distribute inappropriate material to their peers.

Personnel must not:

- ✘ Be alone with a child in a direct, unsupervised capacity
- ✘ Take a child or groups of children into areas where they are not visible by another supervising authorised EDA employee or volunteer
- ✘ Leave children unsupervised.

5.4. Physical Contact

Personnel are required to:

- ✔ Use verbal direction rather than physical touch
- ✔ Seek consent from a child prior to using physical contact (if the contact is necessary) and explain to the child why the physical contact is required
- ✔ Respect and respond to signs that a child is uncomfortable with touch
- ✔ Use physical contact where necessary to protect a child's safety, provide medical assistance, or respond to an emergency situation

✔ Use non-intrusive touch (e.g. a handshake or pat on the back/upper arm) to:

- Comfort a child who is upset or distressed
- Encourage a child to participate in an activity
- Provide reassurance or positive reinforcement.

Personnel must not:

 Touch a child in areas of a sexual nature

 Assist a child with changing clothes or going to the toilet

 Use intrusive forms of discipline

 Allow a child to smack or hit another child

 Initiate, permit or request a hug, massages or kisses with a child

 Threaten to hurt a child through words or gestures.

5.5. Toilets

Personnel are required to:

✔ Use the toilets that align with their biological sex

✔ Knock and announce themselves and wait for approval before entering toilets to supervise, if it is required. It may be required if using public toilets at off-site EDA activities, overnight camps, or overseas camps.

Personnel must not:

 Be alone and unsupervised with a child in a toilet or changing area

 Enter the toilets that do not align with their biological sex

 Use toilets or changing areas that have been allocated to children

 Undress or expose themselves in the presence of children

 Take a child into a cubicle with them.

5.6. Travel

Personnel are required to:

✔ Seek written approval from the child's parent/guardian prior to travel

✔ Ensure they have a working mobile phone and have access to the emergency contact details of each child being transported

Personnel must not:

- Travel alone with a child except in the event of an emergency. In this circumstance, consent should be obtained from the Principal and the child's parent/guardian.
- Provide unauthorised transport to a child
- Allow unauthorised persons to travel with them
- Transport a child to or from their home without prior parent/guardian consent and authorisation from EDA
- Make any unnecessary or unplanned stops during the journey
- Transport children whilst under the influence of alcohol or other substances.

5.7. Overnight Stays

Personnel are required to:

- ✔ Comply with the risk management assessment and checklist completed for the specific overnight activity/program
- ✔ Obtain parent/guardian consent before a child participates in an overnight stay
- ✔ Inform parents/guardians of sleep arrangements before the commencement of an overnight activity
- ✔ Ensure a minimum of two authorised EDA personnel are present when supervising children during overnight stays, including when entering sleeping, accommodation, shower, toilet, or changing facilities for supervision or safety purposes
- ✔ Allow children to contact their parents/guardians if they feel unsafe, uncomfortable or have any concerns
- ✔ Ensure sleep arrangements do not compromise the safety of children, such as children sharing a bed with other children, or with another adult
- ✔ Ensure that for overnight stays which involve a mix of over 18's and under 18's (e.g. university students and senior high school students) that they are allocated separate sleeping areas and different times to use toilet and changing facilities
- ✔ Ensure children are provided with privacy when using toilet and changing facilities.

Personnel must not:

- Be accommodated in the same room as a child
- Leave children unsupervised with unauthorised persons e.g. accommodation staff
- Expose children to movies, television programs, computer games, print media, music or language that promotes violence, intolerance or harm of a person in a sexual,

physical or emotional nature.

5.8. Use of Digital Devices

In performing their duties, personnel are required to:

✔ Only use digital devices for authorised EDA-related operational, safety or emergency purposes. Examples include to:

- Contact a parent/guardian or other emergency contact
- Access authorised EDA systems, such as Consent2Go to view a child's medical or attendance information
- Take authorised photographs or videos of children participating in EDA activities
- Navigate to an EDA activity location, such as Google Maps
- Communicate with other authorised EDA personnel.

✔ Where, for the above purposes, a company-owned device is not available and a personal device is used, personnel are required to:

- Transfer EDA information (including photographs or videos of children) to a company-owned device or authorised cloud system as soon as practicable and within 24 hours
- Permanently delete EDA information from the personal device immediately after it has been transferred.

Personnel must not:

 Use a digital device for unauthorised purposes

 Use or allow digital devices to be used in toilets or changing areas

 Use digital devices for personal purposes whilst transporting or travelling with children. Examples include using social media, texting friends, making personal calls, or listening to podcasts.

 Possess, access, create, distribute or store child abuse material.

5.9. Photography and Video

Personnel are required to:

✔ Ensure the required consent has been obtained before taking photographs or videos of children

✔ Explain to children and their parents/guardians how authorised photographs and videos will be used

✔ Respect a child where they do not wish to be photographed or filmed

- ✔ Destroy, delete or securely de-identify images of children (digital and hard copy) when they are no longer required for their authorised purpose
- ✔ Report inappropriate photography/video to the Centre Principal or Child Safeguarding Officer.

Personnel must not:

- ✘ Take photographs or videos of children without the required consent
- ✘ Take photographs or videos for personal use
- ✘ Share photographs or videos through personal social media accounts or personal messaging platforms
- ✘ Take photographs or videos in circumstances that may compromise a child's dignity, privacy or safety.

5.10. Access to Information and Records

Personnel are required to:

- ✔ Maintain the privacy and confidentiality of children's personal information
- ✔ Store records securely and only within authorised EDA systems
- ✔ Access, use and disclose information about children only where necessary to perform their role
- ✔ Take reasonable steps to protect children's personal information from unauthorised access, loss, misuse or disclosure
- ✔ Immediately report to the Centre Principal or Child Safeguarding Officer any actual or suspected privacy breach, data breach or unauthorised disclosure of children's personal information.

Personnel must not:

- ✘ Access information about a child where there is no legitimate EDA-related purpose
- ✘ Download, copy or retain personal information about a child for personal use
- ✘ Share personal or confidential information about a child without the required consent from the child's parent/guardian. This includes sharing a child's photo, name, residential address, email address or telephone number.

5.11. Online Environment and Social Media

Personnel are required to:

- ✔ Use only authorised EDA communication platforms when communicating online with children and families
- ✔ Obtain required consent before publishing photographs, videos or information about children online.

Personnel must not:

- ✘ Follow, befriend, connect with or interact with children through personal social media accounts
- ✘ Use private messaging, disappear message functions or personal accounts to communicate with children
- ✘ Use digital technology to harass, exploit, humiliate or intimidate a child.

6. Breaches

6.1. Report a Breach of this Code of Conduct

EDA supports an environment where everyone is encouraged to raise any concerns related to child safety. All concerns or allegations relating to a breach of this Code of Conduct should be reported to EDA's Child Safeguarding Officer:

- **Name:** Bev Eguchi
- **Mobile:** 0459 684 978
- **Email:** safeguarding@eda.edu.au

6.2. Alleged Breaches of this Code of Conduct

EDA responds promptly to breaches of this Code of Conduct. The response is managed in a fair, unbiased, and supportive manner, in accordance with EDA's *Child Safe Complaints Handling Procedure*.

Outcomes may include, but are not limited to the following:

- Restriction of employee or volunteer duties
- Providing closer supervision
- Specific education and training
- Mediation between parties
- Disciplinary measures, such as warnings, suspension, or termination
- Termination of contractual arrangement
- Review and update of current policies and procedures.

7. Version History

Version	Effective From	Amendment	Author(s)	Approved by

1	2 August 2024	-	Child Safeguard	Peter Saccasan
2		● Scope ● Definitions ● Communication ● Physical contact ● Overnight stays ● Travel ● Use of Digital Devices ● Access to Information and Records ● Online Environment and Social Media	Child Safeguard	

8. Signed Acknowledgement

I have read and understand my responsibilities in accordance with this Code of Conduct. I understand that I will be subject to disciplinary action if I breach this Code of Conduct.

_____ _____

Signed Date