Cubby OOSH Policies

CUBBYOOSH

ACTIVE & ENGAGING OUT OF SCHOOL HOURS CARE

Quality Area 1

CUBBY OOSH QUALITY AREA 1 POLICY UPDATE REGISTER

Educational Program and Practices: September 2026

Policy Number	Policy Name	What Changed – September 2026
1.01	Educational Curriculum Policy	Updated the policy to a stronger school-age/OOSH educational program framework aligned with My Time, Our Place V2.0. Strengthened child-led play and leisure, educator-supported and spontaneous experiences, children's and young people's voice and agency, inclusion and family input. Updated school-age documentation and assessment requirements, including NSW Regulation 274A, and clarified access to program information under Regulations 75 and 76. Strengthened critical reflection and evaluation, the Educational Leader's role under Regulation 118, current digital technology and child-safety requirements, and the statutory paramount consideration of children's safety, rights and best interests where curriculum decisions affect children.

1.01 Educational Curriculum Policy

INTRODUCTION

Cubby OOSH believes in setting the right program to maximise learning and tailoring a program to assist in setting up skills for life for the children within our care, which is why Cubby OOSH have crafted a specialised program. The program covers five key learning areas:

1. Creative
2. Stem
3. Physical
4. Team
5. Chill

This Program incorporates My Time our Place Framework (MTOP). Vol 2

At Cubby OOSH, children and young people are active participants in curriculum decision-making. Child-directed play and leisure, educator-supported experiences and spontaneous opportunities are informed by children's and young people's interests, strengths, ideas, culture, abilities and emerging skills. Educators use intentionality, responsiveness and critical reflection to develop and extend the educational program in meaningful ways.



FIGURE 4: INTEGRATED TEACHING AND LEARNING APPROACHES

PURPOSE

Cubby OOSH aims to provide a child-led educational program that promotes children's and young people's wellbeing, learning and development, supports agency and inclusion, and incorporates meaningful input from children, young people, families and educators.

SCOPE

The curriculum refers to all interactions, experiences, activities, routines and events, planned and unplanned, that occur within the service and contribute to children's and young people's wellbeing, learning and development.

Cubby OOSH will ensure the educational program:

• is based on My Time, Our Place: Framework for School Age Care in Australia V2.0 (MTOP V2.0);

• contributes to the five learning outcomes of the approved learning framework;

• is child-led and responsive to children's and young people's interests, strengths, experiences, culture, abilities, needs and individual differences;

• provides genuine opportunities for children and young people to exercise agency, make choices, contribute ideas and influence their play, leisure and learning;

• promotes inclusion, equity, cultural responsiveness, sustainability and Aboriginal and Torres Strait Islander perspectives; and

• includes family and community input and spontaneous learning opportunities.

PARAMOUNT CONSIDERATION

In all decisions and actions relating to the educational program, curriculum, experiences, environments and educator practice, the safety, rights and best interests of children and young people will be the paramount consideration.

IMPLEMENTATION

Educational Program and Planning Cycle:

• Educators will gather information about children's and young people's interests, strengths, ideas, experiences, wellbeing and participation through meaningful methods including conversations, children's voice, observations, photographs, group reflections, family input and educator reflection.

• The educational program will demonstrate an ongoing cycle of observing and listening, analysing, planning, implementing, evaluating and critically reflecting.

• For children over preschool age in NSW, evidence about the development of the educational program will be documented in accordance with Regulation 274A. Individual observations or evaluations are not required for every school-age child.

• Documentation will be meaningful, proportionate and relevant to the service context and will support educators to deliver and evaluate the program.

• The program will provide a balance of child-directed play and leisure, educator-supported experiences, intentional opportunities, routines and spontaneous experiences.

Children's and Young People's Agency and Voice:

• Children and young people will be supported to make choices about their participation, experiences, resources and use of environments.

• Their ideas, perspectives, cultures, interests and feedback will be sought and used to inform program planning, evaluation and future experiences.

• Educators will respect children's and young people's right to choose whether and how they participate, while considering safety, wellbeing and the rights of others.

Educational Program:

• The Cubby OOSH program provides broad opportunities across five learning areas: Creative, STEM, Physical, Team and Chill.

• Experiences and resources will be age-appropriate, inclusive, open-ended and responsive to the interests and capabilities of the children and young people attending.

• Indoor and outdoor play, leisure, rest and relaxation, movement, creativity, social connection and opportunities for challenge will be considered within the program.

• Routines will remain flexible where possible so valuable play and leisure experiences are not unnecessarily interrupted.

Documentation and Digital Technologies:

• The educational program and evidence of the planning cycle may be documented through the Cubby OOSH App and other approved service documentation systems.

• Photographs, videos and other digital documentation must only be captured, stored, accessed, transmitted and shared in accordance with the National Law and Regulations, consent requirements and Cubby OOSH policies and procedures.

• Service-supplied devices will be used to capture, store or transmit images of children. Personal devices must not be used for this purpose, and personal device possession and use while working directly with children must comply with current National Law requirements and the Safe Use of Digital Technologies and Online Environments Policy.

Reflection and Evaluation:

• Educators will regularly evaluate the educational program, including children's and young people's participation, voices, wellbeing, learning and feedback.

• Critical reflection will examine educator practice, decision-making, inclusion, equity, relationships, environments and the effectiveness of the program.

• Reflections will identify opportunities for extension, changes to practice and future planning.

• Children and young people will be invited to contribute to reflection and evaluation in meaningful and appropriate ways.

Family Communication and Participation:

• Families will be encouraged to contribute information, ideas, feedback, culture, interests and perspectives to the educational program.

• Information about the content and operation of the educational program will be available to families at the service and/or through the Cubby OOSH App.

• Families may request information about their child's participation, experiences, wellbeing and learning within the program.

EDUCATIONAL LEADER

The appointed Educational Leader will lead the development and implementation of the educational program and support educators to understand and apply MTOP V2.0. The Educational Leader will mentor educators, promote meaningful documentation and critical reflection, ensure children's and young people's voices are evident in planning, and support continuous improvement in curriculum decision-making and practice.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

• Education and Care Services National Law (NSW)

– Paramount consideration of children's safety, rights and best interests

– Section 168 – Offence relating to required programs

– Current child safety and digital device requirements, as applicable

• Education and Care Services National Regulations (NSW)

– Regulation 73 – Educational program

– Regulation 74 – Documenting of child assessments or evaluations for delivery of educational program

– Regulation 75 – Information about educational program to be kept available

– Regulation 76 – Information about educational program to be given to parents

– Regulation 118 – Educational Leader

– Regulation 168(2)(ha) – Safe use of digital technologies and online environments

– Regulation 254 – Declared approved learning framework

– Regulation 274A (NSW) – Programs for children over preschool age

• National Quality Standard – Quality Area 1

– Standard 1.1 – Program

– Standard 1.2 – Practice

– Standard 1.3 – Assessment and Planning

SOURCES

• My Time, Our Place: Framework for School Age Care in Australia V2.0 (2022)

• ACECQA – Guide to the National Quality Framework

• ACECQA – Quality Area 1: Educational Program and Practice

• ACECQA – Educational program documentation for approved providers – school age care

• ACECQA – Strengthened NQF child safety and protections (2025–2026)

• Education and Care Services National Law and National Regulations as applied in NSW

CUBBYOOSH

ACTIVE & ENGAGING OUT OF SCHOOL HOURS CARE

Quality Area 2

CUBBY OOSH QUALITY AREA 2 POLICY UPDATE REGISTER

Children's Health and Safety: September 2026

Policy No.	Policy Name	What changed / updated for September 2026	Key 2026 compliance focus
2.01	Medical Conditions Policy	Clarified medical management plans, risk minimisation and communication plans; updated first aid/anaphylaxis/asthma qualification requirements; privacy and access to plans; self-administration for school-age children; corrected notification requirements.	Regs 90, 96, 136; child-specific health needs; paramount consideration.
2.02	Medication Policy	Corrected medication authorisation and emergency verbal authorisation; added second-person checking requirements; clarified self-administration; removed blanket doctor-letter/paracetamol rules; updated medication record retention.	Regs 92–96, 183; safe medication administration and records.
2.03	Administration of First Aid Policy	Updated first aid qualification/currency requirements, first aid kits, parent notification and incident records; strengthened excursion/transport coverage, infection control and emergency response.	Regs 86–89, 136; current first aid coverage and emergency response.
2.04	Child Protection Policy	Updated child protection responsibilities, mandatory reporting/notification pathways, child-safe culture, responding to disclosures and allegations, staff conduct and the paramount consideration of children's safety, rights and best interests.	2026 child safety reforms; s2A; s166A; strengthened NQS 2.2.3.
2.05	Hygiene Policy	Modernised infection prevention and cleaning practices for school-age OOSH; updated hand hygiene, environmental cleaning and bodily-fluid controls; aligned sources with Staying Healthy 6th Edition.	Reg 77; infection prevention; NHMRC Staying Healthy 6th Ed.

2.06	Hand Washing Policy	Updated when and how children and educators wash hands; school-age appropriate independence and supervision; current infection-control guidance.	Reg 77; NHMRC hand hygiene guidance.
2.07	Toileting Policy	Updated privacy, dignity, supervision and hygiene during toileting; school-age independence; additional-needs support; nappy/toileting assistance where required.	Child dignity, privacy, hygiene and adequate supervision.
2.08	Toy Washing Policy	Updated cleaning/disinfection of toys and shared resources using risk-based infection-control practices; removed outdated blanket cleaning approaches.	Reg 77; Staying Healthy 6th Ed; risk-based cleaning.
2.10	Immunisation, Exclusion & Notifiable Disease Policy	Clarified that NSW No Jab No Play enrolment documentation does not apply to children who have commenced formal schooling; updated exclusion guidance, PHU notification, gastro rules and medical-clearance wording.	Reg 88; NSW Health/NHMRC exclusion guidance; OOSH-specific application.
2.11	Anaphylaxis Policy	Updated to current ASCIA terminology and device-neutral adrenaline injector response; strengthened risk minimisation, communication, medication access, privacy and emergency response.	Regs 90, 94, 96, 136; ASCIA 2026 guidance.
2.12	Asthma Policy	Updated asthma action plans, medication access, emergency asthma first aid and educator qualification requirements; school-age self-management considered where authorised.	Regs 90, 94, 96, 136; current asthma first aid.
2.13	Food Allergy & Intolerance Policy	Updated distinction between allergy/intolerance, individual plans, food-service controls, cross-contact prevention, child inclusion and emergency escalation.	Medical conditions, food safety, allergy risk minimisation.
2.14	Diabetes Policy	Updated individual diabetes management, glucose monitoring, insulin/medication, hypo/hyperglycaemia response, food/activity considerations and school-age self-management.	Regs 90–96; individualised diabetes management.
2.15	Sun Protection Policy	Replaced punitive 'no hat no play' approach with risk-based alternatives;	Sun protection, inclusion, child agency and risk management.

		updated UV-index guidance, SPF 50/50+, shade, clothing and child agency.	
2.16	Food & Nutrition Policy	Updated healthy eating guidance, food safety, allergies/medical needs, positive mealtimes and child choice; included FSANZ Standard 3.2.2A where applicable.	NQS 2.1.3; food safety; positive leisure-based OOSH mealtimes.
2.17	Sleep and Rest Time Policy	Reframed for school-age OOSH: rest, relaxation, quiet spaces and individual needs rather than infant-centred sleep practices; strengthened supervision and wellbeing.	NQS 2.1.1; school-age rest and relaxation.
2.18	Clothing Policy	Updated clothing/footwear expectations to be activity and risk based; cultural, religious, medical and identity considerations; sun protection and excursion suitability.	Inclusion, dignity, safe participation and risk assessment.
2.19	Biting Policy	Reframed biting as behaviour requiring safe, non-shaming response; updated wound care, infection advice, confidentiality, behaviour support and incident recording.	Child-safe behaviour guidance; Regs 86–87; s166A.
2.21	Maintenance of Records Policy	Corrected record-retention periods, including incident records until age 25 and other prescribed records; added CCS/Fair Work retention, privacy and secure cloud/digital storage.	Reg 183; privacy; secure and accurate record keeping.
2.22	Emergency, Evacuation & Lock Down Policy	Updated annual emergency risk assessment, 3-monthly rehearsal requirements, lockdown and school-site procedures, fire danger terminology and shared-site coordination.	Reg 97; emergency rehearsals; school-age/shared-site risk management.
2.23	Incident, Injury, Trauma and Illness Policy	Updated fever and gastro exclusion rules, illness management, serious incident notifications, trauma-informed response, missing-child response, injury photos/privacy and apparent-death procedures.	Regs 85–87, 176; NHMRC 6th Ed; no mandatory delay before 000 for missing child.
2.24	Storage, Labelling & Housing of	Replaced WorkCover/MSDS language with SafeWork NSW/SDS requirements; updated hazardous chemical register, GHS	WHS Regulation 2025; SDS/GHS; secure

	Dangerous Products Policy	labelling, PPE, spills, sharps/needlestick response, batteries and electrical safety.	hazardous-product storage.
2.25	Security Policy	Expanded access control, keys/codes, visitors/contractors, gates and boundaries, opening/closing checks, break-ins, privacy/CCTV and school-site coordination.	Child Safe Standard 8; Regs 99, 103–104; physical security.
2.26	Water Safety Policy	Removed blanket 1:2 water ratio and routine chlorination rules; introduced activity-specific water risk assessment, active supervision, aquatic excursion controls, water hazards, hygiene and emergency response.	Reg 168 water safety policy; adequate supervision; risk-based aquatic controls.
2.27	Road Safety Policy	Updated walking routes, road crossings, school zones/car parks, bicycles/scooters, passenger safety, current child restraints and transport/excursion links.	Regs 100–102 and 102B–102F where applicable; NSW road safety.
2.28	Animal Policy	Added formal risk/benefit assessment, child choice, allergies/phobias, animal welfare, external-provider checks, zoonotic infection controls and bite/scratch response.	NQS QA2/QA3; NHMRC animal-contact hygiene; child agency.
2.29	Screen, Media & Digital Technology Policy	Reframed screen use for a leisure-based OOSH program. Explicitly allows children-requested movies, TV shows, music, games and digital leisure experiences; added balance, classifications, supervision, online safety and alternatives for children who do not wish to participate.	Leisure-based school-age program; balanced screen use; 2026 digital-device reforms.
2.30	COVID-19 Health and Safety Policy and Procedure	Removed outdated pandemic-era 14-day travel/contact exclusions, routine temperature screening, distancing and restricted family entry; reframed COVID-19 as an ongoing infectious respiratory illness and WHS risk.	Current NSW Health/NHMRC illness management; ventilation, hygiene and outbreak response.
2.31	Transportation Policy	Updated Regs 102B–102F, annual transport risk assessments, authorisations, embarking/disembarking records, physical vehicle checks, roll	Safe transportation; no child left in vehicle; no mandatory 30-minute delay before 000.

		reconciliation, supervision, child restraints and emergency/missing-child response.	
2.32	Online Safety within the Service (Online Environment)	Expanded online safety, cyberbullying/grooming risks, inappropriate content, filters/security, personal devices and smart watches, privacy, child voice and incident response; aligned with leisure-based digital use.	Reg 168 digital/online policy requirements; Child Safe Standard 8; online child safety.
2.33	Safe Arrival of Children Policy	Strengthened school-to-OOSH handover, attendance reconciliation, duty of care, Reg 102AAC risk assessment, communication with schools/families, supervision and missing-child escalation.	Regs 102AAB–102AAC; safe arrival; immediate escalation when a child cannot be accounted for.
2.34	Safe Use of Digital Technologies and Online Environments Policy	Updated service-supplied and personal device rules, image/video capture and consent, secure storage/destruction, smart watches, CCTV, cybersecurity, privacy and child voice; aligned with 2.29/2.32 and leisure-based digital use.	Reg 168(2)(ha); ss175A–175J and Regs 179A–179B; 27 Feb 2026 device reforms.

Note: This register summarises the Quality Area 2 policies updated in this review set. Policy numbers 2.09 and 2.20 are not included because they were not part of the policies updated in this set.

2.01 Medical Conditions Policy

INTRODUCTION

Cubby OOSH is committed to protecting the health, safety, rights and wellbeing of children who have a specific health care need, allergy or relevant medical condition. The Service will work in partnership with families and, where appropriate, health professionals to ensure that medical conditions are safely and consistently managed in accordance with the Education and Care Services National Law and Regulations as applied in NSW.

PURPOSE

This policy sets out how Cubby OOSH will identify, assess and minimise health risks; maintain medical management, risk minimisation and communication plans; ensure medication is available and administered safely; respond to medical emergencies; and communicate effectively with children, families, educators, staff and volunteers.

SCOPE

- This policy applies to the Approved Provider, Persons with Management or Control, Nominated Supervisors, Responsible Persons, educators, staff members, volunteers, students, children and families.
- It applies whenever a child has a diagnosed specific health care need, allergy or relevant medical condition, including asthma, diabetes or a diagnosis that the child is at risk of anaphylaxis.
- Information about a child's health will be managed confidentially and only shared with people who need the information to safely educate and care for the child.

PARAMOUNT CONSIDERATION

In all decisions and actions relating to a child's medical condition, the safety, rights and best interests of the child will be the paramount consideration. Children will be supported to participate in decisions about their health care in ways that are appropriate to their age, maturity, abilities and circumstances.

IMPLEMENTATION

The Approved Provider/Management will ensure:

- A medical conditions policy and procedures are in place and implemented in accordance with Regulations 90 and 168.
- The Nominated Supervisor, educators, staff members and volunteers understand the Service's practices for managing medical conditions and know which children have specific health care needs, allergies or relevant medical conditions.
- At least one person who holds a current approved first aid qualification, at least one person who has undertaken current approved anaphylaxis management training, and at least one person who has undertaken current approved emergency asthma management training is in attendance and immediately available in an emergency whenever children are being educated and cared for. These requirements may be met by the same person.
- Training records are monitored so qualifications and required training remain current.
- Emergency medication and medical equipment are stored safely, are clearly identified, are immediately accessible to authorised educators in an emergency and accompany the child when required during excursions, transportation or movement to another area of the service.
- All relevant staff, including casual educators, relief staff, volunteers and students, are informed of the child's medical management plan, risk minimisation plan, communication arrangements and the location of medication before they are responsible for the child.

- The Service's Incident, Injury, Trauma and Illness, Administration of Medication, Excursion, Transportation, Food and Nutrition, Enrolment and Privacy policies are followed where relevant.

When a child has a specific health care need, allergy or relevant medical condition:

- The parent/guardian must provide a medical management plan for the child.
- The Service will follow the medical management plan if an incident occurs in relation to the child's specific health care need, allergy or medical condition.
- A Medical Conditions Risk Minimisation Plan will be developed in consultation with the parent/guardian before, or as soon as practicable after, the child commences care and whenever the child's circumstances or medical management plan change.
- A communication plan will be established so relevant staff and volunteers are informed of the policy and the child's plans, and so the family can communicate changes to the child's medical management and risk minimisation arrangements.
- Where medication has been prescribed for the condition and the risk minimisation plan identifies that the medication must be available for the child to safely attend, the child must not attend without that medication.
- The child will be included in activities wherever it is safe to do so. Reasonable adjustments and risk controls will be considered so a medical condition does not unnecessarily exclude a child from play, leisure, excursions, celebrations or other experiences.

MEDICAL MANAGEMENT PLAN

- The medical management plan is provided by the child's parent/guardian and should contain sufficient current information for the Service to safely manage the child's condition.
- Where relevant, the plan should identify the child, the diagnosed condition, signs and symptoms, triggers, required medication or treatment, emergency response instructions, review information and relevant health practitioner details.
- For asthma, anaphylaxis and allergies, families should provide the current recognised action plan appropriate to the child's condition and prescribed treatment, such as a current Asthma Action Plan or ASCIA Action Plan.
- The family must advise the Service of changes and provide an updated plan when the child's diagnosis, medication, treatment, triggers or emergency instructions change, or when a health professional issues a new plan.
- The Service will check plans and medication regularly and will contact the family where information is unclear, inconsistent, expired or requires updating.

PRIVACY, ACCESS AND DISPLAY OF MEDICAL PLANS

- Medical management plans and risk minimisation plans must be readily accessible to educators and staff who need them to safely care for the child.
- Plans are not required to be publicly displayed. Where the Service displays or places a plan in a staff-only operational area to support rapid identification and emergency response, privacy will be protected and family consent will be obtained where required by the Service's privacy procedures.
- Medical information will not be displayed or shared in a way that unnecessarily exposes the child's personal or health information to other children, families or visitors.
- A current copy of relevant plans must remain available during excursions, transportation and other activities away from the usual service area.

RISK MINIMISATION PLAN

For each child with a specific health care need, allergy or relevant medical condition, the Service will develop a risk minimisation plan in consultation with the parent/guardian. The plan will address, where relevant:

- the risks relating to the child's specific health care need, allergy or medical condition and strategies to assess and minimise those risks;
- safe handling, preparation, consumption and service of food;
- prevention of cross-contamination and management of known allergens;
- how parents will be notified of known allergens that may pose a risk and the strategies used to minimise exposure;
- how staff members and volunteers will identify the child, locate the child's medical management plan and locate the child's medication;
- whether the child must not attend unless prescribed medication is available;
- arrangements for excursions, transportation, celebrations, cooking, sporting activities, incursions and changes to the usual environment;
- safe storage and rapid access to medication and medical equipment;
- the child's capacity to recognise symptoms, seek help or self-administer medication where permitted; and
- review arrangements following changes to the child's condition, medical management plan, medication, an incident or identified risk.

COMMUNICATION PLAN

- Relevant educators, staff members and volunteers will be informed about the Medical Conditions Policy and the child's medical management and risk minimisation plans.
- Families may communicate changes in writing through the Cubby OOSH App, email, updated documentation, enrolment information or direct communication with the Nominated Supervisor/Responsible Person. Urgent changes must be communicated directly to the Service.
- The Service will document and communicate relevant changes to educators before they assume responsibility for the child.
- In accordance with Regulation 91, a copy of this Medical Conditions Policy will be provided to the parent of a child enrolled at the Service who has a specific health care need, allergy or relevant medical condition.

MEDICATION

- Medication will be administered and recorded in accordance with the Administration of Medication Policy and Regulations 92–95.
- Medication must be in its original container, labelled as required, within its expiry date and supplied with any device or equipment required for safe administration.
- Medication for emergency conditions such as asthma, anaphylaxis or diabetes must be accessible without avoidable delay while remaining safely managed.
- In an anaphylaxis or asthma emergency, medication may be administered without prior authorisation where permitted by Regulation 94. The parent and emergency services will be notified as soon as practicable in accordance with the Regulations and the child's emergency plan.

EMERGENCY RESPONSE

If a child experiences a medical emergency or symptoms related to a known or suspected medical condition, educators will:

- remain with and supervise the child and immediately follow the child's medical management/action plan where available;
- provide first aid and administer authorised or emergency medication as required;
- call 000 immediately where required by the child's plan, where symptoms are severe or life threatening, or where educators have concerns about the child's condition;
- notify the parent/guardian as soon as practicable and, if necessary, contact the authorised emergency contact;
- complete the required incident, injury, trauma and illness documentation; and

- ensure the Approved Provider notifies the Regulatory Authority within the prescribed timeframe where the event meets the definition of a serious incident or another notification requirement.

ANAPHYLAXIS AND ALLERGY MANAGEMENT

- The Service will take reasonable steps to minimise exposure to known allergens while supporting the child's inclusion and avoiding unnecessary exclusion or isolation.
- Children will not be permitted to share food, drinks, utensils or food containers where this creates an identified allergy risk.
- Food preparation and serving practices will minimise cross-contact and cross-contamination. Relevant educators, volunteers and food handlers will be informed of required controls.
- Cooking, craft, sensory experiences, celebrations and special events will be checked for identified allergens and adjusted where necessary.
- If anaphylaxis is suspected, educators will follow the child's current ASCIA Action Plan where available, administer the prescribed adrenaline device promptly and call 000. Current ASCIA first aid guidance will be followed where a child-specific plan is unavailable.
- The term 'adrenaline device' will be used rather than relying on a single brand, as several adrenaline devices may be prescribed in Australia.

ASTHMA MANAGEMENT

- The Service will identify and minimise known asthma triggers where reasonably practicable and will ensure the child's reliever medication and spacer, where prescribed, are readily accessible.
- If a child develops asthma symptoms, educators will follow the child's current Asthma Action Plan. If no individual plan is available, educators will provide current recognised asthma first aid and seek emergency assistance as required.
- Severe symptoms, rapid deterioration or failure to respond to reliever medication will be treated as an emergency and 000 will be called.

DIABETES AND OTHER MEDICAL CONDITIONS

- Children with diabetes or other diagnosed medical conditions will be supported in accordance with their medical management plan, risk minimisation plan and any health professional instructions provided by the family.
- Plans will address relevant matters such as medication, blood glucose monitoring, food, physical activity, signs of deterioration, emergency treatment, storage of equipment and access during excursions or transport.
- Educators will only undertake health care procedures for which they are authorised, trained and competent, and for which appropriate instructions and equipment have been provided.

SUPERVISED SELF-ADMINISTRATION OF MEDICATION BY CHILDREN OVER PRESCHOOL AGE

- Cubby OOSH permits a child over preschool age to self-administer medication where this has been agreed with the parent/guardian and is appropriate for the child and condition.
- The arrangements, including the medication location and level of educator supervision, will be documented in the child's medical management and/or risk minimisation plan.
- Educators will supervise or support the child as required and will record the administration or the child's notification of self-administration in accordance with Regulation 96 and the Administration of Medication Policy.
- Self-administration arrangements do not remove the Service's responsibility to ensure medication is available and the child is appropriately supervised.

FAMILIES WILL ENSURE

- Enrolment information accurately identifies the child's specific health care needs, allergies, medical conditions and prescribed medication.
- A current medical management/action plan and all required medication and equipment are provided before care where necessary for the child's safe attendance.
- Medication remains correctly labelled, within expiry and in sufficient quantity.
- The Service is informed promptly of any change to the child's condition, treatment, medication, triggers, emergency instructions or contact information.
- Updated plans are provided when changes occur or a new plan is issued.
- They participate in the development and review of the child's risk minimisation and communication arrangements.

ENROLMENT INFORMATION

The enrolment record must include details of any specific health care need, allergy or relevant medical condition and any medical management plan that is required. This may include, but is not limited to:

- diagnosed risk of anaphylaxis or other allergies;
- asthma;
- diabetes;
- epilepsy or seizure conditions;
- other diagnosed medical conditions or health care needs; and
- prescribed medication and emergency contact information.

Dietary preferences that are not related to a diagnosed health care need, allergy or medical condition will be managed through the Service's enrolment, food and nutrition procedures and do not automatically require a medical conditions risk minimisation plan.

REVIEW

This policy and associated procedures will be reviewed at least annually and earlier where there is a legislative or regulatory change, updated recognised medical guidance, a serious incident, an identified gap in practice or feedback indicating that revision is required. Individual plans will be reviewed with families whenever relevant information changes and following incidents where the existing controls require reconsideration.

STATUTORY LEGISLATION & CONSIDERATIONS

- Education and Care Services National Law (NSW): Section 2A – safety, rights and best interests of children are the paramount consideration; relevant notification and child safety provisions.
- Education and Care Services National Regulations (NSW): Regulation 90 – Medical conditions policy.
- Regulation 91 – Medical conditions policy to be provided to parents.
- Regulation 92 – Medication record.
- Regulation 93 – Administration of medication.
- Regulation 94 – Exception to authorisation requirement—anaphylaxis or asthma emergency.
- Regulation 95 – Procedure for administration of medication.
- Regulation 96 – Self-administration of medication.
- Regulation 136 – First aid qualifications.
- Regulation 162 – Health information to be kept in enrolment record.
- Regulation 168(2)(d) – Policies and procedures relating to medical conditions.
- Regulations 170 and 171 – Policies and procedures to be followed and kept available.
- National Quality Standard: Quality Area 2 – Children's Health and Safety, including Standard 2.1 Health and Standard 2.2 Safety.

SOURCES

- Australian Children's Education and Care Quality Authority (ACECQA) – Guide to the National Quality Framework.
- ACECQA – Dealing with medical conditions in children: Policy and procedure guidelines.
- ACECQA – Guidance for medical management plans, risk minimisation and communication plans (2026).
- Australasian Society of Clinical Immunology and Allergy (ASCIA) – 2026 Action Plans and First Aid Plan for Anaphylaxis.
- Asthma Australia – current Asthma First Aid and Asthma Action Plan guidance.
- National Health and Medical Research Council (NHMRC) – Staying healthy: Preventing infectious diseases in early childhood education and care services, 6th Edition (2024).
- Education and Care Services National Law and National Regulations as applied in NSW.

2.02 Medication Policy

INTRODUCTION

Children attending Cubby OOSH may require medication to manage illness, a specific health care need, allergy or medical condition. Medication is a high-risk area of practice and must be authorised, received, stored, administered, recorded and transported safely. Cubby OOSH will comply with the Education and Care Services National Law and National Regulations as applied in NSW and will follow current recognised health guidance.

PURPOSE

Cubby OOSH aims to protect children's health, safety, rights and wellbeing by ensuring medication is only administered when appropriately authorised and in accordance with the child's medication record, the medication label or instructions, any relevant medical management plan and the National Regulations.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisors, Responsible Persons, educators, staff members, volunteers, children and families. It applies to prescribed and non-prescribed medication brought to, stored at, transported by or administered at the Service.

PARAMOUNT CONSIDERATION

In all decisions and actions relating to medication, the safety, rights and best interests of the child will be the paramount consideration. Children will be treated respectfully and supported to understand and participate in their health care in ways appropriate to their age, maturity and abilities.

DEFINITIONS

Medication

For the purpose of this policy, medication includes prescribed medicines and non-prescribed or over-the-counter products intended to treat or manage a health condition or symptom.

Prescribed medication

- Medication prescribed or directed by a registered medical practitioner and supplied in its original container.
- The original label must identify the child for whom the medication is prescribed and the medication must be administered before its expiry or use-by date.
- Medication must be administered in accordance with the instructions attached to it or written or verbal instructions provided by a registered medical practitioner.

Non-prescribed medication

- Over-the-counter medication may only be administered when appropriately authorised and supplied in its original container bearing the original label and instructions.

- Vitamins, complementary products, herbal preparations and other non-prescribed products will be treated as medication for the purpose of authorisation, storage, administration and recording.
- Educators will not administer a product where the instructions are unclear, the product is unsuitable for the child's age, the packaging or label is incomplete, or there is uncertainty about safe administration.

MEDICATION RECORD AND AUTHORISATION

A medication record will be kept for each child to whom medication is or is to be administered by the Service. The record will include the information required by Regulation 92.

- Authorisation must be signed by a parent or a person named in the child's enrolment record as authorised to consent to the administration of medication.
- The record must include the child's name; medication name; time and date last administered; time/date or circumstances for next administration; dosage; manner of administration; and, after administration, the actual dosage, manner, time/date, administrator's name and signature and the checker's name and signature where a second check is required.
- Cubby OOSH Medication Authority Forms may be used for short-term medication and Long Term Medication Authority Forms may be used for regular or ongoing medication. The form must contain all information required by the Regulations.
- Medication records will be stored confidentially and retained until the end of 3 years after the child's last attendance at the Service.

SHORT-TERM AND LONG-TERM MEDICATION

Short-term medication

Families must provide the required written authorisation before medication is administered, except where an emergency authorisation is permitted under Regulation 93 or Regulation 94 applies.

Long-term medication

For medication required regularly or over an extended period, families must provide current written authorisation and any relevant medical management/action plan. Information must be updated whenever the medication, dosage, administration instructions or child's health needs change. The Service may set reasonable internal review dates to ensure information remains current, but these do not replace the need for immediate updates when circumstances change.

ACCEPTANCE AND REFUSAL OF MEDICATION

- Medication must be physically handed to an educator or Responsible Person and must not be left unsecured in a child's bag, unless an approved self-administration arrangement specifically provides otherwise.
- The medication must match the authorisation and be in its original container with the original label and instructions.
- Prescribed medication must bear the original pharmacy/dispensing label with the name of the child for whom it was prescribed.
- Medication must be within its expiry or use-by date and packaging must not show signs of tampering.
- The Service will not administer medication where required authorisation or information is missing, inconsistent or unclear, except where emergency authorisation is lawfully obtained.

- If a child refuses medication, educators will not force the child. The parent/guardian will be contacted and the child will be monitored. Emergency services will be contacted if the child's condition requires urgent medical attention.

EMERGENCY AUTHORISATION

Where medication is required in an emergency and prior written authorisation is not available, Regulation 93 permits verbal authorisation from a parent or a person named in the enrolment record as authorised to consent to medication. If they cannot reasonably be contacted, verbal authorisation may be obtained from a registered medical practitioner or emergency service.

- The medication administration must still be recorded.
- Where emergency verbal authorisation is used, written notice will be provided to a parent or other family member as soon as practicable.
- In an anaphylaxis or asthma emergency, medication may be administered without prior authorisation under Regulation 94. A parent and emergency services must be notified as soon as practicable.

PROCEDURE FOR ADMINISTRATION OF MEDICATION

Before administering medication, educators will check the child, medication, dose, time, route/manner, instructions, expiry date and authorisation.

- Prescribed medication will be administered from its original container bearing the original label with the child's name and before the expiry or use-by date.
- Other medication will be administered from its original container bearing the original label and instructions and before the expiry or use-by date.
- Medication will be administered in accordance with attached instructions or written or verbal instructions from a registered medical practitioner.
- Except where the Service is legally permitted to operate with only one educator, a person other than the person administering the medication must check the dosage and the identity of the child.
- The administrator and, where required, the second checker will complete and sign the medication record immediately after administration.
- Cubby OOSH may use the safety check of Right Child, Right Medication, Right Dose, Right Time and Right Manner/Route as an additional practice. This does not replace the requirements of Regulations 92 and 95.

WHO MAY ADMINISTER AND CHECK MEDICATION

Medication may be administered by an educator or other person acting for the Service who is authorised and competent to do so in accordance with this policy and the child's instructions. The National Regulations do not require the administrator or checker to hold a 'Senior Educator' title.

- Where Regulation 95 requires a second check, the dosage and identity of the child must be checked by a person other than the person administering the medication.
- A current approved first aid qualification is not, by itself, a legal prerequisite for every routine medication administration; however, the Service will ensure first aid, anaphylaxis and emergency asthma trained persons are in attendance and immediately available as required by Regulation 136.
- Educators must not undertake specialised health care procedures unless they have the information, training, authorisation and competence required to do so safely.

STORAGE OF MEDICATION

- Medication will be stored securely, out of children's unsupervised reach and in accordance with the manufacturer's or pharmacist's storage instructions.
- Medication requiring refrigeration will be stored in a secure, clearly identified container within the refrigerator and at the required temperature.
- Emergency medication must remain readily accessible to educators without avoidable delay while being inaccessible to children unless an approved self-administration arrangement applies.
- Children's medication will be checked regularly for expiry, damage and quantity. Families will be notified when replacement medication is required.
- Expired medication will not be administered and will be returned to the family for appropriate disposal.

TRANSPORTING MEDICATION

- Medication required during transportation, excursions, emergency evacuations or activities away from the usual service area must accompany the child together with relevant authorisation and medical management/action plans.
- Medication will remain under educator control, be protected from loss or unauthorised access and be stored according to required temperature and handling instructions.
- Emergency medication must remain readily accessible and must not be packed in a way that would cause an unsafe delay in an emergency.
- Clear handover communication must occur whenever responsibility for a child's medication transfers between educators or, where authorised by the family, between the Service and school staff.
- The Service will only collect medication from or deliver medication to a school or other person where appropriate family authorisation and safe handover arrangements are in place.

SELF-ADMINISTRATION BY CHILDREN OVER PRESCHOOL AGE

Cubby OOSH may permit a child over preschool age to self-administer medication in accordance with Regulation 96.

- Authorisation for self-administration must be recorded in the child's medication record.
- The child's medical management/risk minimisation arrangements will identify where the medication is kept, how it can be accessed and the level of educator supervision or support required.
- The child must notify an educator when medication has been self-administered, and the notification/self-administration will be recorded in the medication record in accordance with the Service's Medical Conditions Policy.
- Self-administration does not remove the Service's responsibility to supervise the child appropriately and manage foreseeable risks.

PARACETAMOL AND OTHER OVER-THE-COUNTER MEDICATION

Cubby OOSH will not administer paracetamol or other over-the-counter medication solely because a child reaches a particular temperature. Fever is a symptom and the child's overall wellbeing and clinical signs will be considered.

- Paracetamol or other over-the-counter medication will only be administered where there is appropriate authorisation and the medication can be administered in accordance with its original label/instructions and the National Regulations.
- Educators will not exceed the labelled dose or frequency and will consider information about when the medication was last administered to reduce the risk of double dosing.

- A child who is unwell will be made comfortable, supervised and offered fluids as appropriate while the family is contacted in accordance with the Service's illness procedures.
- Emergency services will be contacted where symptoms are severe, rapidly worsening or otherwise require urgent medical attention.

MEDICATION INCIDENTS AND NOTIFICATIONS

- Any medication error, missed dose, incorrect dose, administration to the wrong child, adverse reaction or other medication incident will be responded to immediately with the child's safety as the priority.
- Educators will seek first aid, medical advice and/or emergency assistance as appropriate, notify the parent/guardian as soon as practicable and complete required incident and medication documentation.
- The Approved Provider will notify the NSW Regulatory Authority within the prescribed timeframe when the event meets a notification requirement, including where it constitutes a serious incident. The fact that an ambulance attends does not, by itself, replace the need to assess the incident against the legal notification criteria.
- Medication incidents will be reviewed to identify causes, strengthen controls and reduce the likelihood of recurrence.

FAMILIES WILL ENSURE

- Medication information and authorisations are complete, accurate and current.
- Medication is supplied in its original correctly labelled container, within expiry and with sufficient quantity for the required period.
- The Service is informed of the time and dose of medication last administered before the child arrives where relevant.
- Any change to medication, dosage, instructions or the child's health condition is communicated promptly and updated documentation is provided where required.
- Medication is handed directly to an educator/Responsible Person and collected when no longer required.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law (NSW) - Section 2A: safety, rights and best interests of children are the paramount consideration.
- Education and Care Services National Regulations (NSW) - Regulation 90: Medical conditions policy.
- Regulation 91: Medical conditions policy to be provided to parents.
- Regulation 92: Medication record.
- Regulation 93: Administration of medication.
- Regulation 94: Exception to authorisation requirement - anaphylaxis or asthma emergency.
- Regulation 95: Procedure for administration of medication.
- Regulation 96: Self-administration of medication.
- Regulation 136: First aid qualifications.
- Regulation 168: Education and care service must have policies and procedures.
- Regulations 170 and 171: Policies and procedures to be followed and kept available.
- Regulation 177: Prescribed enrolment and other documents to be kept by approved provider.
- Regulation 183: Storage of records and other documents.
- National Quality Standard - Quality Area 2: Children's Health and Safety, including Standard 2.1 Health and Standard 2.2 Safety.

SOURCES

- Australian Children's Education and Care Quality Authority (ACECQA) - Guide to the National Quality Framework.
- ACECQA - Dealing with medical conditions in children: Policy and procedure guidelines.
- Education and Care Services National Regulations (NSW), current version.
- National Health and Medical Research Council (NHMRC) - Staying healthy: Preventing infectious diseases in early childhood education and care services, 6th Edition (2024).
- Asthma Australia - current asthma first aid guidance.
- Australasian Society of Clinical Immunology and Allergy (ASCIA) - current action plans and anaphylaxis guidance.

2.03 Administration of First Aid Policy

INTRODUCTION

First aid can save lives, prevent deterioration and support recovery following an injury, illness or medical emergency. Cubby OOSH recognises its duty of care to provide prompt and appropriate first aid while maintaining supervision, dignity, privacy and the safety of all children. This policy is specific to school age care and is implemented in accordance with the Education and Care Services National Law and National Regulations as applied in NSW.

PURPOSE

Cubby OOSH aims to ensure that children, educators, staff and visitors can receive appropriate first aid when required and that the Service has suitable first aid arrangements, trained personnel, accessible equipment, clear emergency procedures and accurate incident documentation.

- preserve life and prevent a condition from worsening;
- provide prompt first aid within the responder's level of training and competence;
- seek emergency medical assistance when required;
- comfort, reassure and monitor the injured or unwell person;
- maintain adequate supervision of all children during an incident; and
- record, communicate, notify and review incidents in accordance with legal requirements.

SCOPE

This policy applies to the Approved Provider, Persons with Management or Control, Nominated Supervisors, Responsible Persons, educators, staff members, volunteers, students, children, families and visitors. First aid includes immediate assistance provided to a person who is injured or becomes ill before professional medical assistance is available or while awaiting further treatment.

PARAMOUNT CONSIDERATION

In all decisions and actions relating to first aid, incidents, injury, trauma and illness, the safety, rights and best interests of children will be the paramount consideration. First aid will be provided respectfully, with children informed and involved in a manner appropriate to their age, maturity, abilities and circumstances.

IMPLEMENTATION

The Approved Provider/Management will ensure:

- Every reasonable precaution is taken to protect children from harm and hazards likely to cause injury.
- The Service has procedures for responding to incidents, injury, trauma and illness and these procedures are followed by Nominated Supervisors, staff members and volunteers.
- At all times and at any place children are being educated and cared for, at least one staff member or Nominated Supervisor with a current approved first aid qualification is in attendance and immediately available in an emergency.
- At least one staff member or Nominated Supervisor with current approved anaphylaxis management training and at least one with current approved emergency asthma management training is in attendance and immediately available. The same person may hold one or more of these qualifications.

- Where Regulation 136 provisions for a school site are relied upon, the qualified person must be in attendance at the school site and immediately available in an emergency. Cubby OOSH will maintain arrangements that ensure there is no unsafe delay in obtaining first aid.
- First aid qualification and training records are maintained and monitored. Approved first aid, anaphylaxis and emergency asthma training are treated as current for the periods prescribed by Regulation 136; CPR or emergency life support components requiring annual currency are renewed within the required period.
- Contingency arrangements are in place for breaks, leave, staff absence, excursions, transportation and other situations where the usual first aid trained person may not be available.
- New, casual and relief staff, volunteers and students receive induction about first aid procedures, emergency contacts, first aid kit locations and relevant children's medical conditions and emergency plans.
- Families provide the enrolment authorisations required by Regulation 161 for approved medical treatment and ambulance transportation.
- Staff wellbeing and debriefing support is offered following serious or traumatic incidents where appropriate.

Nominated Supervisor/Responsible Person will:

- Confirm that required first aid, anaphylaxis and emergency asthma trained persons are available for each session and activity.
- Ensure first aid kits are suitably equipped, maintained, clearly identifiable and accessible to educators while remaining appropriately managed for children's safety.
- Ensure a portable first aid kit and relevant emergency medication/plans accompany excursions, transportation and activities away from the usual service area.
- Monitor first aid supplies and arrange replacement of used, damaged or expired items.
- Ensure emergency contact information and current medical management/action plans are accessible when required.
- Support educators to maintain adequate supervision while first aid is being provided.
- Ensure incident, injury, trauma and illness records are completed accurately and parents and the Regulatory Authority are notified when legally required.
- Review significant incidents and first aid responses to identify opportunities to strengthen risk controls, supervision, equipment, training or procedures.

Educators and staff will:

- Respond promptly to an injury, illness or medical emergency and provide first aid within their training and competence.
- Call 000 without delay where a condition is serious, life threatening, rapidly deteriorating or otherwise requires emergency medical assistance.
- Follow the child's current medical management/action plan for known conditions such as anaphylaxis, asthma, diabetes, epilepsy or other diagnosed health care needs.
- Use standard precautions, including hand hygiene and appropriate personal protective equipment, when there is a risk of exposure to blood or body fluids.
- Maintain the privacy and dignity of the person receiving first aid while ensuring appropriate supervision and child safety.
- Accurately document the incident, first aid provided, medication administered, medical personnel contacted, witnesses and notifications made.
- Immediately inform the Nominated Supervisor/Responsible Person of serious incidents, head injuries, suspected fractures, significant bleeding, loss of consciousness, breathing difficulty, seizures, anaphylaxis or other concerning presentations.
- Never delay necessary first aid while waiting to locate paperwork or contact a parent.

BASIC FIRST AID PROCEDURE

- Assess the scene for danger and make the area safe without placing yourself or others at unnecessary risk.

- Assess the child or person and provide immediate first aid. Use DRSABCD and other current first aid principles where relevant.
- Seek assistance from another educator and notify the Nominated Supervisor/Responsible Person as soon as practicable.
- Call 000 where emergency medical assistance is required. Follow directions provided by emergency services.
- Check relevant medical information or action plans as soon as this can be done without delaying urgent care.
- Maintain adequate supervision of all other children. Reorganise educators and spaces where necessary so the injured or ill child can be cared for safely.
- Contact the parent/guardian as soon as practicable. If they cannot be contacted, use the authorised emergency contacts in the enrolment record.
- Continue monitoring and supporting the child until they return to normal activities, are collected by an authorised person, or are transferred to health professionals.
- Complete the Incident, Injury, Trauma and Illness Record and any medication record required.

SERIOUS INCIDENT AND EMERGENCY PROCEDURE

- The first person at the scene will check for danger, assess responsiveness and breathing, call for assistance and commence appropriate first aid.
- Emergency services will be contacted immediately when required. Staff will not wait for parental permission before calling an ambulance in an emergency.
- An educator will remain with the child until responsibility is handed over to ambulance or other health professionals, while another educator maintains supervision of the remaining children.
- The parent/guardian will be notified as soon as practicable.
- The Approved Provider will assess whether the event is a 'serious incident' under Regulation 12 and will notify the NSW Regulatory Authority within 24 hours where required.
- The incident will be documented and reviewed after the immediate emergency has been managed.

PARENT/GUARDIAN NOTIFICATION

If a child is involved in any incident, injury, trauma or illness while being educated and cared for by the Service, the parent must be notified as soon as practicable and no later than 24 hours after the occurrence. Cubby OOSH will contact families earlier where the nature of the incident warrants prompt communication.

- Families will be contacted immediately for serious injuries, significant illness, ambulance attendance, breathing difficulties, anaphylaxis, seizures, suspected fractures, loss of consciousness or other urgent concerns.
- Cubby OOSH will promptly notify families of head injuries and advise them of the circumstances, first aid provided and any signs requiring further medical assessment.
- Parents/guardians may be asked to acknowledge the incident record after they have been informed.

INCIDENT, INJURY, TRAUMA AND ILLNESS RECORD

A record will be completed as soon as practicable and no later than 24 hours after the incident, injury, trauma or onset of illness. The record will include the prescribed information under Regulation 87, including:

- the child’s name and age;
- the circumstances leading to the incident, injury, trauma or illness and any apparent symptoms;
- the time and date;
- details of action taken by the Service, including first aid and medication administered;
- details of any person who witnessed the incident;
- the name and details of any person contacted, including medical or emergency services;
- details of the person notified or attempted to be notified and the time and date; and

- the name and signature of the person making the record and the time and date the record was made.

Incident, injury, trauma and illness records will be stored confidentially for the period prescribed by the National Regulations.

REGULATORY AUTHORITY NOTIFICATIONS

The Approved Provider will notify the NSW Regulatory Authority of serious incidents and other prescribed matters within the timeframe required by the National Law and Regulations. Not every first aid event or ambulance attendance automatically requires notification; the circumstances must be assessed against the definition of a serious incident and other notification provisions.

- Serious incidents must be notified within 24 hours.
- Where there is uncertainty, the Approved Provider will use current ACECQA/NSW Regulatory Authority guidance and the National Decision Tree to determine whether notification is required.
- Records of notifications and supporting information will be retained in accordance with legal requirements.

FIRST AID KITS

The Approved Provider will ensure an appropriate number of first aid kits are kept at the Service in accordance with Regulation 89. The location and contents of kits will reflect the number of children, service layout, activities and reasonably foreseeable risks.

- First aid kits will be suitably equipped and easily recognisable.
- Kits will be readily accessible to educators and staff and positioned so they can be accessed promptly in an emergency.
- Kits will be stored so their contents are not freely accessible to children.
- A portable first aid kit will be available for excursions, transportation, outdoor activities and emergency evacuations.
- Contents will be checked regularly and after use, and used, damaged, contaminated or expired items will be replaced promptly.
- The Service will consider Safe Work Australia first aid guidance when determining appropriate contents, while also considering the specific needs and risks of school age care.
- Medication belonging to an individual child will be managed under the Medical Conditions and Medication Policies and will not be treated as general first aid kit stock.

INFECTION CONTROL DURING FIRST AID

- Educators will perform hand hygiene before and after first aid where practicable and immediately after contact with blood or body fluids.
- Disposable gloves and other appropriate personal protective equipment will be used where exposure to blood or body fluids is reasonably foreseeable.
- Contaminated surfaces and equipment will be cleaned and disinfected appropriately, and contaminated waste will be disposed of safely.
- Single-use items will not be reused.
- Current NHMRC Staying Healthy guidance and the Service's Infectious Diseases Policy will inform infection-control practices.

SPECIFIC MEDICAL EMERGENCIES

Anaphylaxis First Aid

Follow the child's current ASCIA Action Plan and Cubby OOSH Medical Conditions Policy. Administer adrenaline promptly when indicated and call 000.

Asthma First Aid

Follow the child's current Asthma Action Plan and Cubby OOSH Medical Conditions Policy. Provide current recognised asthma first aid and call 000 where symptoms are severe or not responding.

Diabetic Emergency First Aid

Follow the child's current diabetes medical management/action plan and Cubby OOSH Medical Conditions Policy. Seek emergency medical assistance where the child is unconscious, having a seizure, unable to safely swallow, or otherwise seriously unwell.

Seizure/Epilepsy First Aid

Follow the child's seizure management plan where provided, protect the child from injury, do not restrain the child or place anything in their mouth, and call 000 in accordance with the plan or where emergency assistance is required.

EXCURSIONS, TRANSPORTATION AND ACTIVITIES AWAY FROM THE SERVICE

- Risk assessments will consider first aid needs, access to emergency services, communication, relevant medical conditions and emergency medication.
- Required first aid qualifications and training must be available at any place children are being educated and cared for by the Service, subject to the specific school-site provisions in Regulation 136.
- A portable first aid kit, emergency contacts, relevant medical plans and required medication will accompany the group.
- Educators will ensure emergency medication remains immediately accessible and is not stored in a way that causes unsafe delay.

TRAINING AND CURRENCY

- First aid qualifications and approved anaphylaxis and emergency asthma management training must be ACECQA-approved and current.
- Approved first aid qualifications, approved anaphylaxis management training and approved emergency asthma management training are generally taken to be current when completed within the previous three years, subject to Regulation 136.
- Emergency life support and cardiopulmonary resuscitation training must have been completed within the previous year to be taken as current.
- The Service may provide additional scenario practice, including CPR and adrenaline device familiarisation, as part of professional development. Internal practice does not replace required approved training.

FAMILIES WILL

- provide accurate and current health and emergency contact information;
- provide enrolment authorisations for approved medical treatment and ambulance transportation;
- provide current medical management/action plans and required medication for diagnosed medical conditions;
- remain contactable, either directly or through authorised emergency contacts; and
- inform the Service of changes to their child's health needs, medical condition, medication or emergency instructions.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law (NSW) - paramount consideration requirements as applicable in NSW; Section 167 - protection from harm and hazards; Section 169 - staffing arrangements; Section 174 - prescribed information to be notified to Regulatory Authority.
- Education and Care Services National Regulations (NSW) - Regulation 12: Meaning of serious incident.
- Regulation 85: Incident, injury, trauma and illness policies and procedures.
- Regulation 86: Notification to parents of incident, injury, trauma and illness.
- Regulation 87: Incident, injury, trauma and illness record.
- Regulation 89: First aid kits.
- Regulations 90-96: Medical conditions and administration of medication, where relevant.
- Regulation 97: Emergency and evacuation procedures.
- Regulation 100 and related excursion risk assessment provisions, where applicable.
- Regulation 102B and related transportation risk assessment provisions, where applicable.
- Regulation 136: First aid qualifications.
- Regulation 161: Authorisations to be kept in enrolment record.
- Regulation 162: Health information to be kept in enrolment record.
- Regulation 168: Education and care service must have policies and procedures.
- Regulations 174 and 176: Prescribed information and notification timeframes.
- Regulation 183: Storage of records and other documents.
- National Quality Standard - Quality Area 2: Children's Health and Safety, including Standard 2.1 Health and Standard 2.2 Safety.

SOURCES

- Australian Children's Education and Care Quality Authority (ACECQA) - Guide to the National Quality Framework, current 2026 version.
- ACECQA - The Administration of First Aid: Policy and Procedure Guidelines.
- ACECQA - First aid qualifications and training.
- ACECQA - Managing and responding to injury, trauma and illness incidents.
- National Health and Medical Research Council (NHMRC) - Staying healthy: Preventing infectious diseases in early childhood education and care services, 6th Edition (2024).
- Safe Work Australia - First Aid in the Workplace Code of Practice.
- Australasian Society of Clinical Immunology and Allergy (ASCIA) - current anaphylaxis action plans and first aid guidance.
- Asthma Australia - current asthma first aid guidance.
- Education and Care Services National Law and National Regulations as applied in NSW.

2.04 Child Protection Policy

INTRODUCTION

Cubby OOSH is committed to creating and maintaining a child safe culture where the safety, rights, wellbeing and best interests of every child and young person are prioritised. Child abuse, neglect, grooming, exploitation, harmful sexual behaviour and inappropriate conduct are not tolerated. All concerns are taken seriously and acted on promptly, lawfully, respectfully and in a child-focused manner.

PURPOSE

This policy provides a clear NSW OOSH framework for preventing, identifying, responding to, documenting and reporting child safety concerns. It supports staff to meet their mandatory reporting, National Quality Framework, Working with Children Check, Child Safe Scheme and Reportable Conduct Scheme obligations.

SCOPE

This policy applies to the Approved Provider, Persons with Management or Control, Nominated Supervisors, Responsible Persons, educators, staff, volunteers, students, contractors and any other person involved in the operation or delivery of Cubby OOSH services. It applies to concerns arising within or outside the Service where a child may be at risk, and to allegations about employees, volunteers or contractors.

PARAMOUNT CONSIDERATION

The safety, rights and best interests of children are the paramount consideration in every decision and action relating to the operation and delivery of Cubby OOSH. This statutory duty applies to everyone involved in the Service. Child safety will take priority over organisational reputation, convenience, staffing concerns or the interests of an adult.

CHILD SAFE CULTURE AND CHILDREN'S RIGHTS

- Children and young people have the right to be safe, heard, respected and taken seriously.
- Children are supported to participate in decisions affecting them and to raise concerns without fear of punishment or disadvantage.
- Families and communities are informed and involved in child safety, subject to confidentiality and the need not to compromise an investigation or place a child at further risk.
- Equity, culture, disability, language, identity, age and individual needs are considered when preventing and responding to harm.
- Physical and online environments are actively assessed to minimise opportunities for abuse, grooming and inappropriate conduct.
- Cubby OOSH implements and continually reviews the NSW Child Safe Standards and the child-safety requirements of the National Quality Framework.

KEY DEFINITIONS

Child

A person under 18 years of age.

Risk of Significant Harm (ROSH)

A level of concern about a child or young person's safety, welfare or wellbeing that is sufficiently serious to warrant a statutory child protection response under the Children and Young Persons (Care and Protection) Act 1998 (NSW).

Reasonable grounds

An objective basis for a concern, based on what has been observed, disclosed, reported or reasonably inferred from the circumstances, knowledge, training and experience.

Mandatory reporter

A person in a class prescribed by NSW child protection law who is required to report suspected ROSH arising in the course of their work.

Reportable allegation / reportable conduct

An allegation or conduct falling within the NSW Reportable Conduct Scheme under the Children's Guardian Act 2019. This includes specified conduct such as sexual offences or sexual misconduct involving a child, ill-treatment, neglect, assault and behaviour causing significant emotional or psychological harm.

Grooming

Behaviour used to build trust, access or authority over a child, family or community for the purpose of facilitating abuse or exploitation. Grooming may occur in person or online.

FORMS AND INDICATORS OF HARM

Harm may include physical abuse, sexual abuse or exploitation, emotional or psychological abuse, neglect, exposure to domestic and family violence, grooming and other conduct that places a child's safety, welfare or wellbeing at risk. Indicators must be considered in context. A single indicator may be significant and the absence of visible indicators does not mean harm has not occurred.

- unexplained, repeated or patterned injuries; explanations inconsistent with an injury; delays in seeking medical assistance;
- marked changes in behaviour, mood, attendance, sleep, eating, relationships or school participation;
- fear of a particular person or place, regression, hypervigilance, extreme compliance, aggression, withdrawal or self-destructive behaviour;
- age-inappropriate or concerning sexualised behaviour, sexual knowledge or disclosures;
- persistent hunger, poor hygiene, inadequate supervision, untreated health needs or other signs that basic needs are not being met;
- direct or indirect disclosures by a child, family member, peer or other person; and
- signs of coercive control, domestic and family violence, grooming, exploitation or unsafe online contact.

MANDATORY REPORTING - NSW

Educators and other relevant staff in children's services are mandatory reporters under NSW law. A mandatory reporter must make a report to the NSW Department of Communities and Justice (DCJ) where, in the course of their work, they have reasonable grounds to suspect a child is at Risk of Significant Harm. A reporter does not need proof that abuse or neglect has occurred.

- Use the NSW Mandatory Reporter Guide (MRG) and professional judgement to assist decision-making. The MRG supports, but does not replace, professional judgement.
- Where the MRG indicates a report to the Child Protection Helpline is required, make the report promptly. Child Protection Helpline: 13 21 11.
- If a child is in immediate danger or requires urgent police or medical assistance, call 000.
- A staff member must promptly inform the Nominated Supervisor/Responsible Person of a child safety concern, unless doing so would create a risk to the child, compromise reporting, or the concern relates to that person.
- Internal reporting to management does not remove an individual mandatory reporter's legal obligation. Staff must not assume another person has made a required report.
- Where a concern does not meet the ROSH threshold, consider appropriate support, referral, information sharing or escalation consistent with DCJ guidance and the child's best interests.

RESPONDING TO A CHILD'S DISCLOSURE

- Remain calm, listen carefully and give the child your full attention.
- Believe and acknowledge the child. Reassure them that they did the right thing by telling you.
- Do not promise secrecy. Explain, in age-appropriate language, that information will only be shared with people who need to help keep them safe.
- Allow the child to use their own words. Ask only open, minimal questions needed to clarify immediate safety or reporting needs. Do not interrogate, lead, repeatedly question or investigate.
- Do not confront the alleged person responsible for the harm.
- Explain what will happen next where it is safe and appropriate to do so.
- Arrange immediate safety, first aid, medical attention, police assistance or other emergency support where required.
- Document the disclosure as soon as possible, including the child's exact words where practicable, date, time, place, people present, observations, actions taken and notifications made.

DOCUMENTING CHILD SAFETY CONCERNS

- Record facts, observations and direct quotes. Clearly distinguish what was observed from what was reported or inferred.
- Record dates, times, locations, witnesses, injuries or behaviours observed, relevant conversations and actions taken.
- Do not conduct an internal fact-finding interview with a child beyond what is necessary for immediate safety and reporting.
- Store child protection records securely and restrict access to authorised persons.
- Do not alter original notes. Additional information should be dated and added as a further record.
- Preserve relevant evidence and records, including approved digital records, in accordance with legal requirements and Cubby OOSH privacy, records and digital technology policies.

ALLEGATIONS OR CONCERNS ABOUT AN EDUCATOR, STAFF MEMBER, VOLUNTEER OR CONTRACTOR

Any allegation or concern about a person working with or around children must be reported immediately to the Approved Provider or designated senior manager. If the concern relates to that person, staff must escalate to another authorised senior person and may contact the relevant external authority directly. The immediate priority is the safety of children and the integrity of any investigation.

- Take immediate risk-management action, which may include altering duties, increasing supervision, removing access to children or standing a person down where lawful and appropriate. Risk-management action is not a finding of guilt.

- Do not conduct interviews or take steps that may contaminate evidence before obtaining appropriate advice from Police, DCJ, the Office of the Children's Guardian (OCG) or the Regulatory Authority.
- Ensure procedural fairness for the employee while keeping children's safety, rights and best interests paramount.
- Maintain confidentiality and only share information with people who need it for child safety, legal, investigative or employment purposes.

REPORTABLE CONDUCT SCHEME - NSW

Cubby OOSH is a relevant entity under the Children's Guardian Act 2019 and must comply with the NSW Reportable Conduct Scheme. The Head of Relevant Entity is responsible for ensuring reportable allegations and convictions are notified, investigated and reported to the Office of the Children's Guardian in accordance with the Act.

- The OCG must be notified of a reportable allegation or conviction within 7 business days of the Head of Relevant Entity becoming aware of it.
- If the investigation is not complete within 30 calendar days, the required interim information must be provided to the OCG; a final report is provided when the investigation is completed.
- Reportable conduct processes operate alongside, and do not replace, mandatory reporting to DCJ, Police reporting, Regulatory Authority notifications or workplace processes.
- The Approved Provider will obtain current OCG guidance before commencing or directing an investigation and will comply with any restrictions or directions from Police, DCJ or other authorities.

REGULATORY AUTHORITY NOTIFICATIONS

The Approved Provider will notify the NSW Regulatory Authority of prescribed child safety incidents, allegations, complaints and circumstances within the timeframes required by the National Law and Regulations. Since 1 September 2025, incidents or allegations that physical or sexual abuse of a child has occurred or is occurring while the child is being educated and cared for by the Service must be notified within 24 hours. Other prescribed notification requirements will also be assessed and actioned within the applicable timeframe.

INAPPROPRIATE CONDUCT

Children must never be subjected to inappropriate conduct. From 27 February 2026, the National Law includes an offence relating to inappropriate conduct towards children in education and care services. Conduct such as humiliating, intimidating, threatening, degrading, excessively punitive, sexualised or otherwise inappropriate behaviour will be acted on immediately and may also trigger mandatory reporting, reportable conduct, police, Regulatory Authority or employment processes.

HARMFUL SEXUAL BEHAVIOURS BY A CHILD

Cubby OOSH recognises that children may display sexual behaviours across a spectrum from developmentally expected to problematic, concerning or harmful. Responses will be child-focused, trauma-informed, proportionate and designed to keep all children safe without labelling a child as an offender.

- Immediately address safety and separate children only as necessary to prevent further harm while maintaining appropriate supervision and dignity.
- Report concerns to the Nominated Supervisor/Responsible Person and document observations factually.
- Use the MRG and professional judgement to determine whether a DCJ report is required, and contact Police where a criminal or immediate safety concern requires it.
- Develop and regularly review a practical safety and supervision plan where required.

- Support both the child who experienced the behaviour and the child displaying the behaviour, recognising that either child may have unmet support or protection needs.
- Communicate with families when safe, lawful and appropriate, taking care not to disclose another child's confidential information or compromise an investigation.
- Seek specialist support or referral where appropriate.

WORKING WITH CHILDREN CHECKS, RECRUITMENT AND SUITABILITY

- Required Working with Children Checks (WWCC) will be verified before a person undertakes child-related work and monitored in accordance with NSW law and current NQF requirements.
- Recruitment, induction, supervision and performance management will explicitly address child safety, professional boundaries, appropriate conduct, reporting obligations and the Child Safe Standards.
- Any information that may affect a person's suitability to work with children will be assessed promptly and escalated as required.
- The Service will maintain required staff and volunteer records and comply with applicable worker-register requirements.

CHILD PROTECTION AND NATIONAL CHILD SAFETY TRAINING

Cubby OOSH will ensure that all persons who are required by the National Law, National Regulations or NSW requirements to complete child protection and/or national child safety training do so within the prescribed timeframe and maintain any required currency. Training records will be maintained and monitored. Induction and ongoing professional learning will reinforce mandatory reporting, disclosures, professional boundaries, grooming prevention, online safety, inappropriate conduct and reportable conduct obligations.

DIGITAL AND ONLINE CHILD SAFETY

- The Service will implement its Safe Use of Digital Technologies and Online Environments Policy and the NQF requirements governing devices and images of children.
- Images, recordings and personal information about children will only be captured, stored, accessed, transmitted or shared using authorised systems and devices and in accordance with consent, privacy and child safety requirements.
- Personal devices must not be used or possessed contrary to the National Law, Regulations or Service policy while working directly with children.
- Online interactions, platforms and digital activities will be supervised and risk-managed to reduce grooming, exploitation, cyberbullying, exposure to harmful content and other online harms.

FAMILY COMMUNICATION AND CONFIDENTIALITY

Information about a child protection concern is confidential and will only be shared where authorised, required by law or reasonably necessary to protect a child. Families will generally be treated respectfully and kept appropriately informed; however, the Service will not notify a parent, employee or other person if doing so may increase risk to a child, compromise an investigation, breach a direction or reveal protected reporter information. Advice from DCJ, Police, OCG or the Regulatory Authority will be followed.

BREACHES OF THIS POLICY

A breach of this policy or failure to meet child safety obligations will be treated seriously. Depending on the circumstances, action may include immediate risk controls, additional supervision, retraining, performance management, disciplinary action, termination of employment or engagement, and notification to external authorities. Internal action will not replace any required statutory report or notification.

THE 10 NSW CHILD SAFE STANDARDS

- 1. Child safety is embedded in organisational leadership, governance and culture.
- 2. Children participate in decisions affecting them and are taken seriously.
- 3. Families and communities are informed and involved.
- 4. Equity is upheld and diverse needs are taken into account.
- 5. People working with children are suitable and supported.
- 6. Processes to respond to complaints of child abuse are child-focused.
- 7. Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training.
- 8. Physical and online environments minimise the opportunity for abuse to occur.
- 9. Implementation of the Child Safe Standards is continuously reviewed and improved.
- 10. Policies and procedures document how the organisation is child safe.

KEY NSW CONTACTS

- Immediate danger or emergency: 000
- NSW Child Protection Helpline: 13 21 11
- NSW Mandatory Reporter Guide / ChildStory Reporter: reporter.childstory.nsw.gov.au
- Office of the Children's Guardian: ocg.nsw.gov.au
- NSW Early Childhood Education and Care Regulatory Authority / Department of Education: use the current prescribed notification channel, including NQA ITS where applicable.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services) National Law (NSW), including section 2A (paramount consideration), section 166A (inappropriate conduct), section 167 (protection from harm and hazards), sections 162A-162B (child protection and child safety training), relevant Working with Children Check and device provisions, and notification obligations.
- Education and Care Services National Regulations (NSW), including Regulation 84 (awareness of child protection law), applicable child protection training provisions, records/confidentiality requirements, policies and procedures requirements and notification provisions.
- Children and Young Persons (Care and Protection) Act 1998 (NSW), including mandatory reporting obligations and Risk of Significant Harm.
- Children's Guardian Act 2019 (NSW), including the Child Safe Scheme, Working with Children Check and Reportable Conduct Scheme.
- Child Protection (Working with Children) Act 2012 (NSW) and associated requirements, where applicable.
- Crimes Act 1900 (NSW), including offences relevant to child abuse, sexual offences, grooming and failure to protect/report where applicable.
- National Quality Standard - Quality Area 2: Children's Health and Safety and Quality Area 7: Governance and Leadership, including the strengthened child safety focus from 1 January 2026.
- United Nations Convention on the Rights of the Child.

SOURCES

- Australian Children's Education and Care Quality Authority (ACECQA) - Guide to the National Quality Framework and 2025-2026 strengthened child safety resources.
- NSW Department of Communities and Justice - Mandatory Reporter Guide and mandatory reporter guidance.
- NSW Office of the Children's Guardian - Child Safe Standards, Child Safe Scheme, Working with Children Check and Reportable Conduct Scheme guidance.
- NSW Department of Education - Early Childhood Education and Care Regulatory Authority child safety guidance.

- My Time, Our Place: Framework for School Age Care in Australia V2.0.

2.05 Hygiene Policy

INTRODUCTION

Maintaining a clean and hygienic environment is essential to protecting the health, safety and wellbeing of children, educators, families and visitors. Cubby OOSH uses evidence-based infection prevention and control practices appropriate to outside school hours care (OOSH), including effective hand hygiene, respiratory hygiene, environmental cleaning, safe management of body fluids and safe food practices.

PURPOSE

Cubby OOSH aims to minimise the risk and spread of infection by implementing adequate health and hygiene practices in accordance with Regulation 77, current public health advice and Staying healthy: Preventing infectious diseases in early childhood education and care services - 6th Edition (NHMRC, 2024). Educators model positive hygiene practices and support school-age children to develop increasing independence while providing assistance when required.

SCOPE

- This policy applies to the Approved Provider, Nominated Supervisors, Responsible Persons, educators, staff, volunteers, students, children, families, visitors and contractors.
- Hygiene expectations are included in induction, ongoing training, daily practice and service monitoring.
- Cleaning undertaken by educators, school cleaners or external contractors must support the Service to maintain hygienic areas and equipment used by OOSH.
- Families and children will be provided with age-appropriate information about hygiene and infection prevention where relevant.

PARAMOUNT CONSIDERATION

In all hygiene and infection-control decisions, the safety, rights and best interests of children are the paramount consideration. Hygiene practices will protect children from foreseeable health risks while respecting their dignity, privacy, cultural needs, abilities and growing independence.

IMPLEMENTATION

Cubby OOSH will implement adequate health and hygiene practices to minimise risks to children. Practices will be adapted to the service environment, school facilities, activities and identified risks.

- Handwashing facilities used by the Service will have running water, liquid soap and an appropriate method for drying hands. Any hot water accessible to children will be managed to prevent scalding and comply with applicable premises/plumbing requirements.
- Toilets, hand basins, kitchens and other wet areas used by OOSH will be maintained in a hygienic condition. Consumables such as soap, toilet paper and paper towel will be replenished as required.
- Appropriate sanitary disposal facilities will be available. Menstrual hygiene needs will be supported respectfully, privately and inclusively.

- Educators will model and reinforce hygiene practices and provide assistance to children who require support because of age, ability, disability or circumstance.
- Hygiene and infection-control risks identified during the session will be addressed promptly and communicated to the Responsible Person/Nominated Supervisor.

HAND HYGIENE

Regular hand hygiene is one of the most effective ways to reduce the spread of infection. Soap and water is preferred when hands are visibly dirty. Alcohol-based hand sanitiser may be used when hands are not visibly dirty and soap and water are not readily available, provided it is stored and used safely and with appropriate supervision.

- Children and educators will perform hand hygiene before preparing, handling or eating food and after toileting, wiping/blowing noses, contact with body fluids, handling animals, cleaning contaminated items, and at other times when hands may have become contaminated.
- Educators will perform hand hygiene before and after providing first aid or wound care and before putting on and after removing disposable gloves.
- Children will be taught effective handwashing and hand-sanitiser techniques in an age-appropriate way.
- Hand sanitiser does not replace handwashing when hands are visibly dirty and will be used according to manufacturer instructions.

RESPIRATORY HYGIENE

- Children and educators will be encouraged to cover coughs and sneezes with a tissue or their elbow, dispose of used tissues promptly and perform hand hygiene afterwards.
- Educators will support children to wipe or blow their nose hygienically and dispose of tissues immediately.
- Where practical, indoor spaces will be well ventilated. Additional public health measures will be implemented when recommended during outbreaks or periods of increased infectious disease risk.

GLOVES, BLOOD AND BODY FLUIDS

- Disposable gloves will be worn when there is a reasonable chance of contact with blood, vomit, faeces, urine or other body fluids, when managing open wounds, or when cleaning body-fluid spills.
- Gloves are single-use and will be changed between tasks and children. Wearing gloves does not replace hand hygiene.
- Cuts, abrasions and open sores on educators or children will be covered with an appropriate waterproof dressing where practicable.
- Body-fluid spills will be managed promptly using appropriate personal protective equipment and cleaning products in accordance with current Staying Healthy guidance and manufacturer instructions.
- Contaminated waste will be contained and disposed of safely. Reusable cleaning equipment will be cleaned, dried and stored appropriately after use.

ENVIRONMENTAL CLEANING

Routine environmental cleaning will occur daily and whenever surfaces are visibly dirty. Cleaning frequency will be increased for high-touch areas or when infection risks are elevated.

- General hard surfaces will be cleaned using detergent and water or another suitable cleaning product in accordance with manufacturer instructions.
- Disinfectant is not required for every routine clean. Disinfection will be used when indicated, including after appropriate cleaning of body-fluid contamination or where public health guidance recommends it.
- Food preparation and eating surfaces will be cleaned before use and after contamination. Products used on food-contact surfaces will be suitable for that purpose.
- Toys, games, shared equipment and frequently touched resources will be cleaned at a frequency appropriate to their use and contamination risk, and immediately if contaminated with body fluids.
- Washable fabric items such as dress-ups, towels and cushion covers will be laundered when visibly dirty, contaminated and at an appropriate routine frequency.
- Bins will be emptied regularly and cleaned when dirty or contaminated.
- Cleaning chemicals will be labelled, stored securely and inaccessible to children, and Safety Data Sheets will be available where required. Products will never be mixed unless manufacturer instructions specifically permit it.

FOOD AND DRINK HYGIENE

- Safe practices for handling, preparing and storing food will be followed in accordance with Regulation 77 and the Service Food Safety/Nutrition policies.
- Children and educators will perform hand hygiene before handling or eating food.
- Children will be discouraged from sharing food, drinks, drink bottles, plates or utensils.
- Reusable cups, plates and utensils will be washed using an effective cleaning method. Where suitable washing facilities are unavailable, clean single-use items may be used.
- Dropped or contaminated eating utensils will be replaced or cleaned before reuse.
- Food preparation areas will be kept clean and protected from pests and contamination.

PERSONAL HYGIENE AND EDUCATOR RESPONSIBILITIES

- Educators will maintain personal hygiene appropriate to professional work with children and model respectful hygiene practices.
- Educators, staff and volunteers who have symptoms of an infectious disease will follow the Service Infectious Diseases Policy, current exclusion guidance and public health advice. A medical clearance will only be requested where required by public health guidance, legislation or the circumstances of the illness.
- Open wounds will be appropriately covered and hand hygiene/PPE used as required.
- The Service is smoke-free and vape-free in accordance with applicable law and Service policy.
- Educators will promptly report hygiene hazards, insufficient supplies, pest activity, plumbing issues or cleaning concerns to the Responsible Person/Nominated Supervisor.

CHILDREN WILL BE SUPPORTED TO

- perform effective hand hygiene at appropriate times;
- use respiratory hygiene when coughing, sneezing or blowing their nose;
- use toilets and sanitary facilities hygienically and with dignity;
- avoid sharing food, drinks and personal items where this could increase infection risk;
- keep cuts and sores appropriately covered;

- understand why hygiene practices help protect themselves and others; and
- develop independence in personal hygiene while asking educators for assistance when needed.

OUTBREAKS AND INCREASED INFECTION RISK

- The Service will follow current NSW Health, NHMRC and Regulatory Authority advice when an infectious disease outbreak or increased infection risk is identified.
- Additional measures may include increased cleaning, enhanced hand and respiratory hygiene, improved ventilation, exclusion in accordance with current guidance, communication with families and advice from public health authorities.
- Cleaning and hygiene practices will be reviewed after outbreaks or significant incidents to identify improvements.

STATUTORY LEGISLATION & CONSIDERATIONS

- Education and Care Services National Law (NSW) - Section 2A: safety, rights and best interests of children are the paramount consideration; Section 167: protection from harm and hazards.
- Education and Care Services National Regulations (NSW) - Regulation 77: Health, hygiene and safe food practices.
- Regulation 88: Infectious diseases.
- Regulation 103: Premises, furniture and equipment to be safe, clean and in good repair.
- Regulation 168: Education and care service must have policies and procedures, including health and safety matters.
- Regulations 170 and 171: Policies and procedures to be followed and kept available.
- Work Health and Safety Act 2011 (NSW), as applicable.
- National Quality Standard - Quality Area 2: Children's Health and Safety, including Standard 2.1 Health and Standard 2.2 Safety.

SOURCES

- Australian Children's Education and Care Quality Authority (ACECQA) - Guide to the National Quality Framework and Quality Area 2 guidance.
- National Health and Medical Research Council (NHMRC) - Staying healthy: Preventing infectious diseases in early childhood education and care services, 6th Edition (2024), current online guidance.
- NSW Health - current infectious disease and public health guidance.
- Food Standards Australia New Zealand - Australia New Zealand Food Standards Code, where applicable.
- Safe Work Australia / SafeWork NSW - workplace infection prevention and hazardous chemical guidance, where applicable.

- Education and Care Services National Law and National Regulations as applied in NSW.

2.06 Hand Washing Policy

INTRODUCTION

Effective hand hygiene is one of the most important ways to reduce the spread of infectious diseases. Cubby OOSH promotes regular hand hygiene by children, educators, staff, volunteers and visitors and teaches children practical hygiene habits appropriate to school age care.

PURPOSE

To ensure consistent and effective hand hygiene practices are used throughout Cubby OOSH to minimise infection risks, meet current NSW education and care requirements and support children to develop increasing independence in caring for their own health and wellbeing.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisors, Responsible Persons, educators, staff, volunteers, students, children, families and visitors. Hand hygiene includes washing hands with soap and running water and, where appropriate, using alcohol-based hand sanitiser.

WHEN CHILDREN SHOULD PERFORM HAND HYGIENE

Children will be encouraged and supported to perform hand hygiene at appropriate times, including:

- on arrival at the Service where appropriate;
- before eating or handling food;
- after using the toilet;
- after touching mucus, blowing or wiping their nose, coughing or sneezing into their hands;
- after coming in from outside play;
- after touching animals or animal environments;
- after contact with blood or other body fluids;
- when hands are visibly dirty, sticky or contaminated; and
- at other times identified by educators following an activity or exposure that may spread germs.

WHEN EDUCATORS, STAFF AND VOLUNTEERS SHOULD PERFORM HAND HYGIENE

Educators, staff and volunteers will perform hand hygiene whenever needed to minimise infection risks, including:

- on arrival at the Service and before leaving where appropriate;
- before preparing, serving or eating food and after handling food where contamination may have occurred;
- after using the toilet or assisting a child with toileting;
- before and after providing first aid, dressing wounds or other health care;
- before and after administering medication where hand hygiene is relevant to safe administration;
- after contact with mucus, saliva, vomit, urine, faeces, blood or other body fluids;
- after removing disposable gloves;
- after cleaning contaminated areas or handling waste;
- after outdoor activities or touching animals; and
- whenever hands are visibly dirty or contamination is suspected.

HAND WASHING WITH SOAP AND WATER

Washing with soap and running water is the preferred method when hands are visibly dirty, greasy or have food on them. Antibacterial soap is not required. Warm running water is recommended where available; cold running water may be used if warm water is not available.

Hand Washing Procedure

- 1. Wet hands with running water.
- 2. Apply soap.
- 3. Lather and rub hands thoroughly, including wrists, palms, backs of hands, between fingers, around thumbs and under nails, for at least 20 seconds. Move rings or jewellery so the skin underneath is cleaned.
- 4. Rinse thoroughly under running water.
- 5. Dry hands thoroughly. Disposable paper towel is preferred in education and care services. If cloth towels are used, they must be individual-use, not shared, hung to dry between uses and laundered regularly.

Adequate age-appropriate hand washing and drying facilities, liquid soap and drying materials will be maintained and replenished so children and educators can perform hand hygiene effectively.

ALCOHOL-BASED HAND SANITISER

Alcohol-based hand sanitiser containing approximately 60-80% alcohol may be used when hands are not visibly dirty and is particularly useful when soap and water are not readily available, such as in outdoor areas or on excursions.

- Apply the amount recommended by the manufacturer to dry hands.
- Rub hands together, covering palms, backs of hands, between fingers, around thumbs and under nails.
- Continue rubbing until hands are dry, which should take about 20 seconds.
- Hand sanitiser is not a substitute for washing with soap and water when hands are visibly dirty, greasy or contaminated with food.
- Hand sanitiser must be stored securely and out of unsupervised reach of children. Children may use it only with appropriate educator supervision.
- Products will remain in their original or clearly labelled container and relevant safety information/SDS will be accessible where required.

HAND DRYING

Thorough hand drying is an essential part of hand hygiene because damp hands can transfer germs more readily. Disposable paper towel is preferred. Air hand dryers may be used where provided and appropriately maintained. Shared cloth hand towels will not be used.

GLOVES AND HAND HYGIENE

- Disposable gloves do not replace hand hygiene.
- Hands will be cleaned before putting on gloves where appropriate and after gloves are removed.
- Gloves will be changed between tasks and between children where contamination may be transferred.
- Single-use gloves will be disposed of after use and will not be washed or reused.

CHILDREN'S LEARNING AND PARTICIPATION

Educators will model effective hand hygiene, provide reminders and visual prompts where useful, and support children to become increasingly independent. Assistance will be provided respectfully to children who need help because of age, ability, injury, disability or other individual needs. Hand hygiene routines will not be used as punishment or applied in a way that unnecessarily excludes a child from participation.

MANAGEMENT AND EDUCATOR RESPONSIBILITIES

- The Approved Provider and Nominated Supervisor will ensure adequate health and hygiene practices are implemented to minimise risks to children in accordance with Regulation 77.
- Educators, staff and volunteers will follow this policy and the Cubby OOSH Handwashing Procedure and model appropriate hygiene practices.
- Hand washing facilities, soap, paper towel or other suitable drying facilities will be checked and replenished regularly.
- Hand hygiene expectations will be included in induction and reinforced through ongoing training, supervision and reflective practice.
- Hand hygiene practices may be increased or adapted during infectious disease outbreaks or in response to public health advice.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law as applied in NSW.
- Education and Care Services National Regulations (NSW) - Regulation 77: Health, hygiene and safe food practices.
- Regulation 88: Infectious diseases.
- Regulation 109: Toilet and hygiene facilities.
- Regulation 168: Education and care service must have policies and procedures.
- Work Health and Safety Act 2011 (NSW).
- Public Health Act 2010 (NSW), where applicable.
- National Quality Standard - Quality Area 2: Children's Health and Safety, including Standard 2.1 Health and Standard 2.2 Safety.

SOURCES

- Australian Children's Education and Care Quality Authority (ACECQA) - Guide to the National Quality Framework and Quality Area 2 guidance.
- National Health and Medical Research Council (NHMRC) - Staying healthy: Preventing infectious diseases in early childhood education and care services, 6th Edition (2024), including Hand Hygiene guidance.
- Education and Care Services National Regulations (NSW), current 2026 version.
- Hand Hygiene Australia - hand hygiene guidance referenced by NHMRC Staying Healthy.

2.07 Toileting Policy

INTRODUCTION

Toileting and personal care are important parts of children's health, wellbeing and participation in outside school hours care. Cubby OOSH recognises that school-age children have increasing independence and a right to privacy, dignity and respectful support. Toileting practices will balance children's individual needs and autonomy with hygiene, child safety and adequate supervision.

PURPOSE

Cubby OOSH is committed to providing safe, hygienic, inclusive and respectful toileting arrangements that minimise the spread of infection, protect children from harm and support independence. Toileting and intimate care will be undertaken in a way that maintains each child's dignity, rights, privacy and best interests.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisors, Responsible Persons, educators, staff, volunteers, students, children, families and visitors. It applies during before school care, after school care, vacation care, excursions and any other period in which children are being educated and cared for by Cubby OOSH.

PARAMOUNT CONSIDERATION

The safety, rights and best interests of children are the paramount consideration in all decisions and actions relating to toileting and personal care. Children will be listened to, treated respectfully and supported to participate in decisions about their own personal care in a manner appropriate to their age, development and circumstances.

IMPLEMENTATION

The Approved Provider/Nominated Supervisor will:

- Ensure toileting arrangements, supervision plans and risk assessments reflect the age, abilities, individual needs and increasing independence of school-age children.
- Ensure toilet, washing and drying facilities are safe, accessible, hygienic and appropriate for the children attending the service, including children with additional needs.
- Ensure the location and use of bathrooms, including shared school bathrooms or bathrooms outside the immediate OOSH space, are considered in the service supervision plan.
- Ensure procedures for toileting and intimate care are communicated during induction and reviewed when the environment, cohort or identified risks change.
- Ensure soiled clothing and personal-care items are handled and stored hygienically, securely and in a way that protects children's privacy.

Educators will:

- Support children to use the toilet when needed. Children will not be required to wait for scheduled toileting times or be unnecessarily restricted from accessing bathroom facilities.

- Promote independence and self-help skills, including dressing, handwashing and managing personal hygiene, while providing assistance when requested or required.
- Respect each child's privacy and dignity. Assistance with toileting, changing clothes or intimate care will be limited to what is necessary and explained to the child before and during the process.
- Use calm, respectful and non-shaming language when responding to toileting accidents, wet or soiled clothing, menstruation or other personal hygiene needs.
- Maintain adequate supervision while recognising the privacy needs and increasing independence of school-age children. Supervision may include agreed bathroom procedures, awareness of who is using the bathroom, appropriate positioning of educators, and timely checks where required by the child's age, needs, location or identified risk.
- Never use toileting, access to a bathroom or personal care as a punishment, behaviour-management strategy or means of humiliation.
- Ensure children wash and dry their hands after using the toilet and follow the service Hand Washing and Hygiene procedures.
- Use gloves and appropriate infection-control practices when there is a risk of contact with urine, faeces, blood or other body fluids, and perform hand hygiene after removing gloves.
- Manage accidents promptly. Soiled clothing will be placed in a sealed or securely contained bag for collection and will not be rinsed in areas used for food preparation.
- Maintain confidentiality and only share information about a child's toileting or personal-care needs with people who need the information to safely support the child.

SUPERVISION, PRIVACY AND CHILD SAFETY

Cubby OOSH recognises that many school-age services operate on school sites where bathrooms may be outside the immediate service space. Educators will adjust supervision practices to the environment and the age and abilities of children, while protecting privacy and dignity.

- Children must remain adequately supervised when travelling to and from bathroom facilities and while accessing areas associated with the service.
- For school-age children, adequate supervision does not ordinarily require an educator to directly view a child while they are using a toilet. Educators must nevertheless know where children are and respond to risks identified in the supervision plan.
- Where a child requires direct assistance with toileting or intimate care, practices will be child-safe, transparent and consistent with the child's individual needs and any agreed support plan.
- If a parent/carer is assisting their own child in a bathroom used by other children, educators will manage access and supervision so other children's privacy and safety are protected.
- Personal phones, cameras or other unauthorised image-recording devices must not be used to photograph or record children during toileting, changing or intimate-care routines.

INDIVIDUAL AND ADDITIONAL SUPPORT NEEDS

Where a child needs assistance due to disability, developmental needs, continence needs, medical needs or other circumstances, Cubby OOSH will work with the child and family to establish respectful and practical arrangements. Where appropriate, relevant health or allied-health advice may inform an individual support or risk-minimisation plan. Reasonable adjustments will be considered to support safe and equitable participation.

NAPPY CHANGING - WHERE APPLICABLE

Although Cubby OOSH primarily provides care for school-age children, some children may require continence products or nappy changing as part of their individual care needs. Where this occurs, educators will follow the Cubby OOSH Nappy Change Procedure and current infection-control guidance in Staying Healthy: Preventing infectious diseases in early childhood education and care services - 6th Edition. The child's privacy, dignity, supervision and individual needs must be maintained throughout.

HYGIENE AND INFECTION CONTROL

- Hand hygiene must be performed at the appropriate times before and after personal-care tasks.
- Gloves are used when contact with body fluids is anticipated. Gloves do not replace hand hygiene.
- Body-fluid spills and contaminated surfaces are cleaned promptly using the service's current hygiene and infection-control procedures.
- Toilet and handwashing areas are maintained in a clean and safe condition, with appropriate soap and hand-drying facilities available.

CHILDREN'S VOICE AND PROTECTIVE PRACTICES

Children will be supported to understand body autonomy, privacy and personal boundaries. Educators will respond seriously and sensitively if a child expresses discomfort, asks for a different form of assistance, refuses unnecessary physical contact or raises a concern about another person's behaviour. Any child protection concern or disclosure will be managed in accordance with the Child Protection Policy.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law (NSW) - including adequate supervision, protection from harm and hazards, and the safety, rights and best interests of children as the paramount consideration.
- Education and Care Services National Regulations - Regulation 77 Health, hygiene and safe food practices; Regulation 88 Infectious diseases; Regulation 109 Toilet and hygiene facilities; Regulation 112 Nappy change facilities (where applicable); Regulation 115 Premises designed to facilitate supervision; Regulation 155 Interactions with children; Regulation 168 Policies and procedures.
- Children and Young Persons (Care and Protection) Act 1998 (NSW).
- Child Safe Standards for Permanent Care and organisational child-safe practice in NSW, as applicable to the service.
- National Quality Standard - Quality Area 2: Children's Health and Safety; Quality Area 3: Physical Environment; Quality Area 5: Relationships with Children.

SOURCES

- Australian Children's Education and Care Quality Authority (ACECQA) - Guide to the National Quality Framework and Quality Area 2 guidance.
- ACECQA - Toileting and nappy changing principles and practices.

- National Health and Medical Research Council (NHMRC), Staying Healthy: Preventing infectious diseases in early childhood education and care services - 6th Edition (2024).
- My Time, Our Place: Framework for School Age Care in Australia V2.0.
- NSW Office of the Children's Guardian - Child Safe Standards.

2.08 Toy Washing Policy

INTRODUCTION

Shared toys, games, books, equipment and soft furnishings can become contaminated with germs through hands, respiratory droplets, saliva, body fluids and contact with unclean surfaces. Effective routine cleaning helps break the chain of infection while allowing children to safely enjoy shared resources. Cubby OOSH will use cleaning practices that are appropriate for school age care and consistent with current infection prevention guidance.

PURPOSE

To ensure toys, games, books, equipment, storage containers and shared play resources are maintained in a clean and hygienic condition, using safe and effective cleaning practices that minimise the risk of infectious disease while protecting children from cleaning chemicals and other hazards.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisors, Responsible Persons, educators, staff members, volunteers and students. It applies to shared indoor and outdoor toys, games, books, equipment, soft furnishings, play mats and storage containers used by children at Cubby OOSH.

PARAMOUNT CONSIDERATION

In all decisions relating to cleaning practices and children's access to toys and equipment, the safety, rights and best interests of children will be the paramount consideration. Cleaning arrangements will support children's play and participation without exposing them to cleaning chemicals, contaminated equipment or unnecessary hazards.

IMPLEMENTATION

- Routine environmental cleaning will occur daily and whenever items or surfaces are visibly dirty. The frequency of cleaning individual toys and resources will be based on how they are used, the likelihood of contamination and current infection risks.
- Toys or resources that have been mouthed, sneezed or coughed on, contaminated with body fluids, visibly soiled, or used by a child who becomes unwell will be removed from use promptly and placed in a clearly identified 'toys to wash' container that is inaccessible to children.
- Hard, washable toys will be cleaned using warm water and detergent with mechanical action such as scrubbing, then rinsed well and allowed to dry thoroughly before returning to use.
- Where manufacturer instructions permit, suitable toys may be cleaned in a dishwasher. Toys must not be washed in the dishwasher at the same time as dishes, cups, utensils or food equipment.
- Clean toys and dirty/to-be-washed toys will be kept separate to prevent cross-contamination.
- Damp or wet toys and books will remain out of use until completely dry.
- Sunlight may be used to assist drying where suitable, but items must still be cleaned appropriately before drying.
- Educators will perform hand hygiene after handling contaminated items and after removing cleaning gloves.

TOYS, GAMES AND EQUIPMENT

- Cubby OOSH will preference toys and shared resources that can be effectively cleaned and maintained.
- Frequently used shared resources will be checked routinely for visible dirt, damage and contamination and cleaned as required.
- Electronic toys and equipment will be cleaned in accordance with manufacturer instructions using a method that does not damage the item or create an electrical hazard.
- Outdoor equipment and shared sports resources will be cleaned when visibly dirty or contaminated and as required by the Service's routine cleaning schedule.
- Storage tubs, baskets, shelving and other toy storage areas will be included in routine cleaning and will be cleaned when visibly dirty or contaminated.
- Damaged items that cannot be effectively cleaned, are unsafe, or have deteriorated to the point that hygienic use cannot be maintained will be removed from use.

BOOKS AND PAPER-BASED RESOURCES

- Books will be checked for visible dirt or contamination and cleaned where the material permits by wiping with a moist cloth and detergent, then allowing the item to dry completely.
- Wet or damp books will be removed from use until dry.
- Books or paper-based resources contaminated with body fluids, or that cannot be effectively cleaned and safely reused, will be discarded where necessary.

SOFT TOYS, CUSHIONS AND FABRIC ITEMS

- Shared soft toys and fabric resources must be washable. Non-washable soft toys intended for general shared use will not be purchased or will be removed from shared use where they cannot be hygienically maintained.
- Washable soft toys will be laundered in accordance with manufacturer instructions when visibly dirty, contaminated, or as required by the Service's cleaning schedule.
- Cushions used by children will have washable/removable covers where practicable. Covers will be washed regularly and whenever visibly dirty or contaminated with body fluids.
- Fabric items must be fully dry before being returned to use.

PLAY MATS AND FLOOR RESOURCES

- Hard or impermeable play mats will be cleaned as part of routine environmental cleaning and whenever visibly dirty or contaminated.
- Carpeted or fabric mats will be vacuumed and cleaned in accordance with the Service's cleaning schedule and manufacturer instructions, with additional cleaning following contamination.
- Any item contaminated by a spill of blood, vomit, urine, faeces, saliva or other body fluid will be managed using the Service's body-fluid spill and hygiene procedures.

CLEANING PRODUCTS AND EQUIPMENT

- Detergent and other cleaning products will be suitable for their intended purpose and used in accordance with the manufacturer's label, dilution and safety instructions.

- Vinegar, bicarbonate of soda or other domestic kitchen products will not be relied upon as substitutes for effective cleaning products.
- Disinfectant is not required for routine cleaning of every toy. Disinfection will be used where indicated, including following body-fluid contamination, an identified infectious disease risk, or advice from a public health authority.
- Cleaning chemicals, disinfectants and cleaning equipment will be stored securely and inaccessible to children.
- Safety Data Sheets will be available where required under workplace health and safety arrangements.
- Cleaning equipment will be maintained in a clean condition and stored so it can dry between uses. Reusable cloths will be appropriately laundered and dried between uses.

INFECTIOUS DISEASE OR OUTBREAK RESPONSE

- During an outbreak or when an increased infection risk is identified, Cubby OOSH may increase the frequency and extent of toy and environmental cleaning.
- The Service will follow advice from NSW Health, the local Public Health Unit, NHMRC Staying Healthy guidance and any directions relevant to the particular infectious disease.
- Resources that are difficult to clean may be temporarily removed from use where this is necessary to minimise infection risk.

EDUCATOR RESPONSIBILITIES

- Educators will monitor toys and shared resources throughout the session and remove contaminated or visibly dirty items from use.
- Educators will ensure children do not access cleaning products or contaminated 'toys to wash' containers.
- Cleaning will be undertaken in a way that maintains adequate supervision of children at all times.
- Educators will model and encourage appropriate hand hygiene before and after relevant play and cleaning activities.
- Cleaning tasks will be recorded on the Service's cleaning/toy washing checklist or other approved monitoring system in accordance with local service procedures.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law (NSW) - Section 167: protection from harm and hazards.
- Education and Care Services National Regulations (NSW) - Regulation 77: health, hygiene and safe food practices.
- Regulation 88: infectious diseases.
- Regulation 103: premises, furniture and equipment to be safe, clean and in good repair.
- Regulation 105: furniture, materials and equipment.
- Regulation 168: education and care service must have policies and procedures.
- Regulations 170 and 171: policies and procedures to be followed and kept available.
- Work Health and Safety Act 2011 (NSW) and applicable Work Health and Safety Regulation requirements.
- National Quality Standard - Quality Area 2: Children's Health and Safety, including Standard 2.1 Health and Standard 2.2 Safety.

- National Quality Standard - Quality Area 3: Physical Environment, including Standard 3.1 Design and Standard 3.2 Use.

SOURCES

- National Health and Medical Research Council (NHMRC) - Staying healthy: Preventing infectious diseases in early childhood education and care services, 6th Edition (2024).
- Australian Children's Education and Care Quality Authority (ACECQA) - Guide to the National Quality Framework.
- Education and Care Services National Law and National Regulations as applied in NSW.
- NSW Health - current infectious disease and public health guidance, where applicable.

2.09 Head Lice Policy

INTRODUCTION

Pediculus Humanus Capitis commonly known as head lice can cause concern and frustration for families, educators and children. This policy is intended to outline roles, responsibilities and expectations of Cubby OOSH to assist with treating and controlling head lice in a consistent and coordinated manner.

PURPOSE

Cubby OOSH aims to prevent the spread of head lice within the service's environment, and educate families on best practises for prevention and treatment of headlice.

SCOPE

- Headlice eggs take approximately 7-10 days to hatch, and adult lice can produce more eggs only a week after the first eggs hatch, meaning this is an ongoing struggle and battle for families to eliminate infestation. It's imperative that treatment is an immediate action after identifying eggs or live lice, as the infection period lasts as long as the eggs and lice are alive.
- Headlice can spread quickly from one person to another via direct head to head contact. Note: this is the only way headlice can be transmitted, as lice will not live through clothing, bedding, furniture, carpet, soft toys etc.

IMPLEMENTATION

The Australian Government National Health and Medical Research Council: Staying Healthy 5th Edition: Preventing infectious diseases in early childhood education and care services guide recommends the following steps, in collaboration with Cubby OOSH approach:

Educators will:

- Ensure that any educators who identifies headlice will adhere to this policy and latest Government Health Department guidelines.
- To help reduce the stigma, and maintain confidentiality, when headlice is identified, a letter should be provided to all the children involved, as well as a direct phone call to families at the time head lice/eggs are sighted.
- Keep families informed if there is someone at the Service with Head Lice, via the Cubby OOSH App, and also via a clear poster within the foyer of the service. It is recommended the service prints off the facts sheet from 'Staying Healthy in Childcare 5th Edition" to provide this information to families.

If a child is seen to have Head Lice, the following will occur;

- The Nominated Supervisor will be notified - if one child in the group has head lice, it is likely that several others will also have them.
- Reduce head-to-head contact between children when the education and care service is aware that someone has head lice.

- The child will not be made to feel isolated at any time and will not have to be sent home effectively immediately, however monitored closely for close interactions with peers. A strategy made include having the child/ren keep their hats on to prevent head to head contact.

If there is an outbreak of Head Lice, we ask families;

- To check children's hair for head lice on a weekly basis, at home, using the recommended conditioner/combing detection method.
- That your child does not attend unless effective treatment has taken place:
  1. Brush hair with a standard comb/brush
  2. Apply ample conditioner to dry hair, covering roots down to the ends, as this will make it easy to detect eggs/lice. Brush through the conditioner to distribute consistently.
  3. Separate hair into sections. Using a head lice comb, begin to push the teeth of the comb through the hair at the roots, through to the ends of the hair. The comb will need to be cleared with tissues or paper towels throughout the process.
  4. Repeat this process for the remainder of the sections of hair, until the entirety of hair is complete.
  5. This will be required daily until there is no present evidence of head lice or eggs.
- To regularly inspect all household members and then treat them if necessary.
- To notify the Service if their child is found to have live lice and advise when appropriate treatment was commenced
- Those children with long hair will attend the Service with hair tied back.
- To use only safe and recommended practices to treat head lice.
- To notify the families of your child's friends, so they have an early opportunity to detect and treat their children if necessary.
- To maintain a sympathetic attitude and avoid stigmatising/blaming families who are experiencing difficulty with control measures.
- To act responsibly and respectfully when dealing with members of the Service and broader community especially around issues of head lice.
- In cases of severe outbreaks, children may be individually checked as they arrive at the Service each day, with the approval of the families.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law Act 2010
- Section 172 Offence to fail to display prescribed information
- Education and Care Services National Regulations 2011
  - Regulation 88 Infectious Disease
  - Regulation 171 Policies and Procedures to be kept available
  - Regulation 173 Prescribed information to be displayed
- Work health and Safety Act 2011
- Public Health and Wellbeing Act 2008
- National Quality Standards
  - Standard 2.1 Health
  - Standard 2.2 Safety

SOURCES

- ACECQA
- Staying Healthy – Preventing infectious diseases in early childhood education and care services – 5th Edition

2.10 Immunisation, Exclusion & Notifiable Disease Policy

INTRODUCTION

Cubby OOSH is committed to reducing the spread of infectious disease and protecting the health, safety, rights and wellbeing of children, educators, families and visitors. This policy is specific to outside school hours care (OOSH) in NSW and is informed by the Education and Care Services National Law and Regulations, NSW public health requirements and the current NHMRC Staying healthy guidelines.

PURPOSE

To provide clear, current procedures for managing immunisation information, illness, exclusion, outbreaks and notifiable diseases in a school-age care setting, while supporting children respectfully and maintaining confidentiality.

SCOPE

This policy applies to the Approved Provider, persons with management or control, Nominated Supervisors, Responsible Persons, educators, staff, volunteers, students, children, families and visitors.

PARAMOUNT CONSIDERATION

In all decisions under this policy, the safety, rights and best interests of children are the paramount consideration. Responses to illness and exclusion will be proportionate, respectful, non-discriminatory and based on current health advice.

IMMUNISATION IN OOSH

NSW vaccination enrolment requirements for child care do not apply in the same way to children who have commenced formal schooling. Children attending before and after school care are a permanent exemption from the NSW child-care vaccination enrolment documentation requirement. Cubby OOSH may still request and securely record relevant immunisation information where this assists health management and outbreak response.

• A child will not be refused OOSH enrolment solely because an AIR Immunisation History Statement has not been supplied where the child has commenced formal schooling.

• Families should advise the service of relevant immunisation information and any medical vulnerability that may affect outbreak management.

• During an outbreak, a Public Health Unit may direct or recommend exclusion of a child who is not immune to a particular vaccine-preventable disease, even if the child is well.

• Immunisation information is health information and must be stored and shared only as authorised or required.

STAFF IMMUNISATION

Educators and other staff are encouraged to discuss recommended vaccinations with their health practitioner and follow current Australian Immunisation Handbook and workplace health advice. The service may provide information about vaccine-preventable diseases and occupational risks. Any staff immunisation information collected will be handled confidentially.

• Pregnant or immunocompromised workers should seek individual medical advice about infectious disease risks and appropriate work practices.

• Routine infection-control precautions apply regardless of a person's known immunisation or infection status.

IDENTIFYING ILLNESS

Educators will monitor children for changes in health, behaviour and general wellbeing. Symptoms are considered together with the child's usual presentation and any known non-infectious condition.

• A child with serious or rapidly worsening symptoms requires urgent medical assessment and, where indicated, 000.

• A child who becomes unwell at the service will be supported in a comfortable, supervised area away from close contact with other children where practicable, without isolating them in a way that compromises supervision or dignity.

• Families will be contacted as soon as practicable when a child is unwell and collection is required.

• Incident, injury, trauma and illness records will be completed where required by the National Regulations.

EXCLUSION FROM THE SERVICE

Exclusion is used to reduce transmission of infectious disease. Cubby OOSH will apply the current NHMRC Staying healthy minimum exclusion periods, together with any NSW Health or Public Health Unit direction.

Cubby OOSH 24-Hour Vomiting Exclusion: A child or educator who vomits will be excluded from the service until at least 24 hours have passed since their last episode of vomiting and they are otherwise well enough to participate in the program. Where vomiting or diarrhoea is confirmed to be due to norovirus, the minimum exclusion period is 48 hours after symptoms have stopped.

Medical Clearance:
Where educators or the Nominated Supervisor have reasonable concerns about a child's health, ongoing symptoms, repeated illness, the risk of infection to others, or whether the child is well enough to safely return to OOSH, the service may request that the family obtain medical advice and/or written medical information before the child returns. Any request will be reasonable and based on the individual circumstances. A medical certificate does not override an applicable minimum exclusion period or a direction from NSW Health or the Public Health Unit.

• Exclusion decisions will be based on symptoms, diagnosed conditions, general wellness, ability to participate safely and any public health direction.

• There is no blanket rule that every illness requires 24 or 48 hours away from care. The current exclusion period for the relevant symptom or diagnosed condition will be followed.

• For diarrhoea or vomiting, the current NHMRC guidance is generally exclusion until there has been no diarrhoea or vomiting for at least 24 hours; confirmed norovirus requires at least 48 hours without symptoms.

• A child is not automatically excluded because they received paracetamol or ibuprofen the previous evening. Medication use, symptoms and general wellness will be considered.

Medical clearance is not automatically required after every illness; however, educators or the Nominated Supervisor may request medical advice or written medical information where there are reasonable concerns about the child's health, infectious risk or safe return to the service.

• Children or adults with mild residual symptoms may return when they otherwise meet the applicable health guidance and are well enough to participate.

RETURNING TO OOSH

Families will be advised of the applicable minimum exclusion period and any additional Public Health Unit direction. Minimum periods do not override the need for a person to be well enough to participate in the program. Good hand and respiratory hygiene will continue to be reinforced after return.

NOTIFIABLE DISEASES AND NSW PUBLIC HEALTH UNIT

The Nominated Supervisor/Responsible Person will contact the local NSW Public Health Unit on 1300 066 055 as soon as possible where notification is required, and will follow Public Health Unit directions about communication, exclusion, cleaning and other control measures.

Current NSW reporting requirements for schools and child care facilities include:

• Diphtheria

• Gastroenteritis – 2 or more cases

• Haemophilus influenzae type b (Hib)

• Measles

• Meningococcal disease

• Mumps

• Pertussis (whooping cough)

• Poliomyelitis (polio)

• Rubella

• Tetanus

The service will also seek Public Health Unit guidance if it suspects an outbreak of another infectious disease, including respiratory illnesses such as influenza, COVID-19 or RSV.

INFECTIOUS DISEASE PROCEDURE

• Respond promptly to the child's health and emotional needs and maintain effective supervision.

• Use standard precautions, hand hygiene and appropriate personal protective equipment when there is contact with blood or body fluids.

• Separate the unwell child from close contact with others where practicable while keeping the child supervised and supported.

• Contact the parent/authorised nominee and arrange collection where exclusion is required.

• Call 000 for serious or life-threatening symptoms.

• Record the illness and actions taken in accordance with the National Regulations and service procedures.

• Where an infectious disease is confirmed, provide families with appropriate information without identifying the affected child or family.

• Increase cleaning and infection-control measures where indicated.

• Contact the Public Health Unit when notification is required or advice is needed.

• Follow any Public Health Unit direction about exclusion of cases or contacts.

OUTBREAK MANAGEMENT

An outbreak may involve a sudden increase in cases, and for some diseases a single case may require public health action. Management will be guided by the Public Health Unit and current Staying healthy advice.

• Review attendance and illness records to identify linked cases.

• Strengthen hand hygiene, respiratory hygiene, environmental cleaning and food-safety controls.

• Temporarily restrict shared high-contact resources or activities where advised.

• Communicate factual, privacy-protective information to families and staff.

• Apply any additional exclusion periods or other measures directed by the Public Health Unit.

GASTROENTERITIS

Two or more cases of gastroenteritis must be reported to the NSW Public Health Unit. Children and staff with diarrhoea or vomiting should leave the service as soon as practicable and follow current exclusion guidance. Food handlers with these symptoms must follow the additional restrictions in current public health guidance.

RESPIRATORY ILLNESS

Children and staff with respiratory symptoms will be assessed according to the combination, severity and onset of symptoms and general wellness. Good ventilation where available, hand hygiene,

respiratory etiquette and cleaning of frequently touched surfaces will be promoted. Public Health Unit advice will be sought if an outbreak is suspected.

BLOOD-BORNE VIRUSES, INCLUDING HIV AND HEPATITIS B/C

A person will not be excluded or discriminated against solely because they have, or are thought to have, HIV or a blood-borne virus. Health information will remain confidential. Standard precautions are used for all blood and body-fluid exposure, regardless of known status.

• Wear appropriate gloves when contact with blood or body fluids is anticipated.

• Cover cuts and broken skin with a waterproof dressing.

• Wash exposed skin promptly with soap and water; flush eyes or mucous membranes with water if exposed.

• Manage sharps or significant occupational exposure in accordance with first aid/WHS procedures and seek prompt medical advice.

• Clean blood and body-fluid spills using the service's current infection-control procedure.

MENINGOCOCCAL DISEASE / MENINGITIS

Meningitis can have infectious and non-infectious causes. Suspected meningococcal disease is a medical emergency. Educators must not diagnose or prescribe treatment. If a child has serious symptoms such as severe headache, neck stiffness, altered consciousness, breathing difficulty, a non-blanching rash or rapid deterioration, call 000. Confirmed or suspected cases requiring public health action will be managed with the NSW Public Health Unit. Any preventive antibiotics for contacts are determined by medical/public health professionals.

FAMILY RESPONSIBILITIES

• Keep children at home when they are unwell or during an applicable exclusion period.

• Notify the service as soon as practicable if a child is diagnosed with an infectious or notifiable disease.

• Provide relevant medical information that assists the service to keep the child safe.

• Follow Public Health Unit directions during outbreaks.

• Collect an unwell child as soon as practicable when contacted.

EDUCATOR AND STAFF RESPONSIBILITIES

• Follow this policy, the Hygiene Policy, Hand Washing Policy, Medication Policy and Administration of First Aid Policy.

• Do not attend work when infectious or too unwell to safely perform duties.

• Maintain current knowledge of infection prevention and exclusion requirements.

• Protect children's privacy and avoid discussing diagnoses with people who do not need the information.

• Model effective hand and respiratory hygiene and support children to do the same.

RECORDS, PRIVACY AND COMMUNICATION

Health and illness records will be stored securely and retained for the periods required by law. Family notifications about infectious disease will contain the information needed to protect health while avoiding unnecessary disclosure of personal or identifying information.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

• Education and Care Services National Law (NSW) – including the paramount consideration, reasonable precautions and notification obligations

• Education and Care Services National Regulations – Regulations 77, 85, 86, 87, 88, 90–96, 161, 162, 168, 171, 176 and 183, as applicable

• Public Health Act 2010 (NSW) and Public Health Regulation 2022 (NSW)

• Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2025 (NSW), as applicable

• Privacy Act 1988 (Cth) and applicable NSW privacy requirements

• National Quality Standard – Quality Area 2: Children's Health and Safety

SOURCES

• Australian Children's Education and Care Quality Authority (ACECQA) – Guide to the National Quality Framework and infectious disease guidance

• NSW Health – vaccination requirements for child care, schools and OOSH; reporting notifiable diseases; Public Health Unit guidance

• National Health and Medical Research Council (NHMRC) – Staying healthy: Preventing infectious diseases in early childhood education and care services, 6th Edition (2024), including current online updates

• Australian Government Department of Health, Disability and Ageing – Australian Immunisation Handbook and Australian Immunisation Register

2.11 Anaphylaxis Policy

INTRODUCTION

Anaphylaxis is a severe, potentially life-threatening allergic reaction that requires immediate treatment with adrenaline (epinephrine). Symptoms can progress rapidly and anaphylaxis can occur without skin symptoms. Cubby OOSH is committed to an allergy-aware approach that reduces exposure risk while ensuring children with allergies are included safely and respectfully in the program.

PURPOSE

To ensure Cubby OOSH identifies and minimises anaphylaxis risks, meets current NSW OOSH regulatory requirements, maintains effective medical management arrangements and responds immediately and correctly to allergic reactions and anaphylaxis.

SCOPE

This policy applies to the Approved Provider, persons with management or control, Nominated Supervisors, Responsible Persons, educators, staff, volunteers, students, children, families, visitors and contractors.

PARAMOUNT CONSIDERATION

The safety, rights and best interests of children are the paramount consideration. Allergy management will protect children from harm while supporting dignity, inclusion, participation and age-appropriate independence.

ALLERGY-AWARE APPROACH

Cubby OOSH will use an allergy-aware, child-specific risk management approach rather than relying on a blanket “nut-free” claim. No environment can guarantee the complete absence of an allergen. Risk controls will be based on each child’s confirmed allergens, medical management plan, service environment and activities.

- Families and children will be asked not to share food, drink bottles, utensils or food containers.
- Known allergens and cross-contact risks will be considered when purchasing, preparing, serving and storing food and when planning cooking, craft, sensory and special-event activities.
- Reasonable strategies may include restricting particular foods or materials where identified in an individual risk minimisation plan.
- Children with allergies will not be isolated or unnecessarily excluded from activities because of their allergy.

ENROLMENT AND MEDICAL MANAGEMENT

When a child has a specific health care need, allergy or is diagnosed at risk of anaphylaxis, Regulation 90 requirements will be implemented before and throughout attendance.

- The family must provide a current medical management plan. For diagnosed allergy/anaphylaxis, an ASCIA Action Plan completed and signed by the treating prescriber is the nationally recognised plan.
- A child-specific risk minimisation plan will be developed in consultation with the family and will address relevant allergens, food practices, activities, excursions, medication access, identification of the child and other service-specific risks.
- A communication plan will ensure relevant staff and volunteers know the medical conditions policy, the child’s medical management and risk minimisation plans, medication location and how families communicate changes.
- Where relevant to the child’s condition, the risk minimisation plan will require the child not to attend without prescribed emergency medication.
- The family will promptly advise the service of changes to diagnosis, allergens, treatment or medication and provide updated documentation when required.

ASCIA ACTION PLANS - 2026

Cubby OOSH will use the current ASCIA Action Plan appropriate to the child and prescribed adrenaline device. The 2026 plans include a general version and device-specific versions. ASCIA Action Plans do not expire, but annual medical review is best practice and families will be encouraged to have the plan reviewed each year and whenever the child's condition or treatment changes.

- A personal RED ASCIA Action Plan is a medical document and must not be altered by the service.
- The ORANGE ASCIA First Aid Plan for Anaphylaxis may be displayed as a general emergency reference because it contains no child-specific personal information.
- Where the two-page general 2026 ASCIA plan is used, both pages must be available together.

PRIVACY, ACCESS AND DISPLAY

The child's medical management plan, risk minimisation plan and medication must be readily accessible to relevant educators and staff in an emergency. Personal health information will not be publicly displayed unnecessarily. Where a personal action plan is displayed or made visible for operational safety, this will be managed in consultation with the family and with regard to privacy. A copy may instead be kept in a readily accessible staff folder and with the child's medication.

- A notice that a child diagnosed at risk of anaphylaxis is enrolled at the service will be displayed as required by Regulation 173, without naming the child.

ADRENALINE DEVICES AND STORAGE

The service will follow the child's ASCIA Action Plan and instructions for the specific prescribed adrenaline device. Current Australian devices may include EpiPen®, Anapen®, Jext® and neffy®. The policy will not hard-code device instructions that may become outdated.

- Prescribed emergency medication will be immediately accessible to adults, known to all relevant staff, protected from inappropriate access by children and stored according to manufacturer requirements.
- Expiry dates and condition of devices will be checked routinely and families advised in advance when replacement is required.
- Medication and the child's action plan will accompany the child on excursions, transport and activities away from the usual service area.
- Where the service holds a general-use adrenaline device, it will be stored with the current ORANGE ASCIA First Aid Plan and managed in accordance with service procedures.

TRAINING AND STAFF AWARENESS

The Approved Provider will ensure Regulation 136 requirements are met at all times. At least one staff member or Nominated Supervisor with current approved anaphylaxis management training must be in attendance and immediately available in an emergency. For a service operating on a school site, Regulation 136(2) arrangements may apply where appropriately qualified school staff are in attendance on the school site and immediately available.

- Cubby OOSH will aim for broad staff capability through induction, regular refreshers, practice scenarios and trainer-device practice appropriate to the devices used by enrolled children.
- All relevant educators, relief staff, volunteers and students will be informed of children at risk, their allergens, risk controls, plan location and medication location before assuming responsibility for children.
- Training currency will be monitored against ACECQA-approved qualification and training requirements.

FOOD AND ACTIVITY RISK MINIMISATION

- Follow the child-specific risk minimisation plan and safe food-handling procedures at every meal and snack.
- Check ingredient labels each time a packaged food is used because ingredients can change.
- Prevent cross-contact through clean hands, surfaces, utensils, preparation areas and appropriate food storage.

- Use a deliberate meal-check process before serving food to a child with diagnosed food allergy; where meals are prepared and served, Cubby OOSH may use the NSW Department of Education Meal Checkpoint Resource as a risk-minimisation tool.
- Do not rely on children to independently identify all food risks. Support age-appropriate self-management while educators retain duty of care.
- Assess risks for cooking, craft, sensory play, gardening, animals, insect exposure, celebrations, excursions and vacation care activities.

RECOGNISING ANAPHYLAXIS

Educators will follow the current ASCIA Action Plan. Anaphylaxis may occur without a preceding mild reaction and without skin symptoms. Watch for ANY ONE sign of anaphylaxis, including:

- difficult or noisy breathing
- swelling of the tongue
- swelling or tightness in the throat
- wheeze or persistent cough
- difficulty talking or hoarse voice
- persistent dizziness or collapse
- pale and floppy appearance in young children

For insect allergy, abdominal pain and vomiting can also be signs of anaphylaxis. If a person with known asthma and allergy to food, insects or medication has sudden breathing difficulty after possible allergen exposure, give adrenaline first and then asthma reliever medication in accordance with the ASCIA plan.

EMERGENCY RESPONSE - ANAPHYLAXIS

If anaphylaxis is suspected, act immediately. If in doubt, give adrenaline. Delayed adrenaline increases risk.

- LAY THE PERSON FLAT and do not allow them to stand or walk. If unconscious, place in the recovery position. If breathing is difficult, allow them to sit with legs outstretched. Hold young children flat, not upright.
- GIVE THE ADRENALINE DEVICE immediately, following the child's ASCIA Action Plan and the instructions for the available device.
- PHONE 000 and state that the person is having anaphylaxis.
- PHONE the family/emergency contact as soon as practicable.
- Give a further adrenaline dose if there is no response after 5 minutes and another device is available, following the ASCIA plan/emergency advice.
- Commence CPR at any time if the person is unresponsive or not breathing normally.
- The person must be transferred to hospital by ambulance for medical assessment/observation, even if symptoms improve.
- Do not give antihistamine instead of adrenaline for anaphylaxis and do not delay adrenaline while waiting for antihistamine, asthma medication, family consent or an ambulance.

ANAPHYLAXIS IN A CHILD WITHOUT A KNOWN DIAGNOSIS

If a child with no known allergy develops signs of anaphylaxis, follow the current ORANGE ASCIA First Aid Plan for Anaphylaxis. Regulation 94 permits medication to be administered without prior authorisation in an anaphylaxis emergency. A service/general-use adrenaline device may be used where available and appropriate. Required parent and emergency notifications must then be made as soon as practicable.

SELF-ADMINISTRATION BY SCHOOL-AGE CHILDREN

Where Cubby OOSH permits a child over preschool age to self-administer medication, this will be addressed in the Medical Conditions Policy, the child's plans and medication record as required by

Regulation 90(2)-(3) and Regulation 96. An educator must still respond and assist if the child is too unwell to self-administer. A child experiencing anaphylaxis must not be expected to stand or walk to retrieve medication.

EXCURSIONS, TRANSPORT AND VACATION CARE

- Medication and plans must travel with the child and remain immediately accessible to supervising adults.
- Risk assessments will consider food, venues, travel time, emergency access, mobile coverage, insect exposure, activities and the location of emergency medication.
- All supervising educators must know the child's risk controls and emergency response before departure.

FAMILY RESPONSIBILITIES

- Inform the service of diagnosed allergies and anaphylaxis risk at enrolment or immediately following diagnosis.
- Provide the medical management/ASCIA Action Plan and prescribed medication required under the child's risk minimisation plan.
- Keep medication in date and notify the service of changes to the child's condition or treatment.
- Work with the service to develop and review the risk minimisation and communication arrangements.

EDUCATING CHILDREN

Allergy education will be inclusive and privacy-aware. Educators may teach children not to share food, to wash hands, to seek adult help if they feel unwell and to respect another child's food and medication needs. A child's diagnosis will not be discussed publicly or used as a label without a legitimate safety need.

AFTER AN ANAPHYLAXIS INCIDENT

- Complete the required incident, injury, trauma and illness record and medication record.
- Notify the parent/authorised nominee as soon as practicable and complete Regulatory Authority notification where the incident meets the serious incident or other prescribed notification requirements.
- Debrief involved staff, support the child and family, and review the incident circumstances.
- Review and update the child's risk minimisation and communication arrangements and service practices where required before the child returns.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law (NSW) - including the paramount consideration and section 167 protection from harm and hazards
- Education and Care Services National Regulations - Regulations 77, 85-87, 90-96, 136, 161-162, 168, 170-171, 173 and 176, as applicable
- Work Health and Safety Act 2011 (NSW) and applicable WHS Regulation
- National Quality Standard - Quality Area 2: Children's Health and Safety, including Standards 2.1 and 2.2

SOURCES

- ACECQA - Guide to the National Quality Framework; medical conditions and first aid qualification guidance
- NSW Department of Education - Anaphylaxis and Allergy Prevention and Management (including OOSH guidance and Meal Checkpoint Resource)
- Australasian Society of Clinical Immunology and Allergy (ASCIA) - 2026 Action Plans, First Aid Plan, adrenaline device guidance and anaphylaxis guidance

- National Allergy Council - Best Practice Guidelines for Anaphylaxis Prevention and Management in Children's Education and Care Services

2.12 Asthma Policy

INTRODUCTION

Asthma is a chronic inflammatory condition of the airways that can cause variable symptoms including wheeze, cough, chest tightness and difficulty breathing. Symptoms can range from mild to life-threatening and may change quickly. With appropriate management, children with asthma should be supported to participate safely and fully in the OOSH program.

PURPOSE

Cubby OOSH aims to minimise asthma-related risk by ensuring children with asthma have appropriate medical information, medication and individual risk controls, and that educators can recognise and respond promptly to an asthma emergency.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisors, Responsible Persons, educators, staff, volunteers, students, children and families across before school care, after school care, vacation care, excursions and other off-site activities.

PARAMOUNT CONSIDERATION

The safety, rights and best interests of children are the paramount consideration. Children with asthma will be supported in a respectful, inclusive and age-appropriate way that promotes participation, increasing independence and dignity.

ASTHMA MANAGEMENT AT OOSH

- Children with diagnosed asthma must have a current medical management/Asthma Action Plan prepared by, or in consultation with, an appropriate medical practitioner and provided by the family.
- A risk minimisation plan and communication plan will be developed with the family in accordance with Regulation 90 and reviewed when the child's needs, treatment, environment or activities change.
- Relevant educators, including relief staff, will know the child's usual symptoms, triggers, medication, action plan and where medication is stored.
- Personal health information and plans will be readily accessible to staff who need them but managed in a way that protects the child's privacy and confidentiality.
- Children with asthma will not be excluded from activities solely because of asthma. Reasonable adjustments and risk controls will be used to support safe participation.

MEDICATION AND EQUIPMENT

- Families must provide the child's prescribed reliever medication and any required spacer or other device, in its original labelled container and within expiry, unless an alternative arrangement is documented in the child's plan.
- Medication must be stored so it is immediately accessible to educators in an emergency, while remaining inaccessible to children except where an approved self-administration arrangement applies.
- Expiry dates and the condition of medication and equipment will be checked regularly and families advised when replacement is required.
- Spacers and masks will be cleaned, replaced or managed in accordance with current manufacturer and infection-control guidance; they are not automatically discarded after every use.
- Medication administration will be recorded and managed in accordance with Regulations 92–95 and the Cubby OOSH Medication Policy.

TRAINING AND STAFFING

In accordance with Regulation 136, at least one staff member or Nominated Supervisor who has undertaken current approved emergency asthma management training must be in attendance at all

times and immediately available in an emergency at any place children are being educated and cared for by the service. The required first aid and anaphylaxis training arrangements will also be maintained.

- Training details and currency will be recorded in staff records.
- All educators will be inducted into service-specific asthma procedures and the needs of children with asthma before being responsible for their care.
- Asthma First Aid information will be accessible to educators and current procedures will be reinforced through refreshers and emergency practice.

RECOGNISING ASTHMA SYMPTOMS

Symptoms can include wheeze, persistent cough, shortness of breath, chest tightness, difficulty speaking, difficulty participating in normal activity or a child reporting that breathing feels difficult. Not everyone with asthma will wheeze.

Emergency warning signs include severe or rapidly worsening breathing difficulty, inability to speak comfortably, reliever medication not working, blue lips, collapse, altered consciousness or a child appearing severely distressed.

ASTHMA FIRST AID AND EMERGENCY RESPONSE

Where a child has a current Asthma Action Plan, educators will follow that plan. Asthma medicines and first-aid instructions now vary according to the reliever prescribed, so the service will not rely on one generic dosing sequence for every child.

- Sit the child upright, remain calm and reassuring, and do not leave them alone.
- Give the child's reliever medication using the dose and device specified in their current Asthma Action Plan or current Asthma Australia first-aid instructions for that medicine.
- For a standard blue/grey reliever puffer, current general first aid is 4 separate puffs through a spacer, 1 puff at a time with 4 breaths after each puff; wait 4 minutes and repeat if breathing has not returned to normal.
- Call Triple Zero (000) if there is no improvement after the repeat treatment, if symptoms are severe or suddenly worsening, if the child is not breathing, or whenever there is uncertainty about whether the breathing problem is asthma.
- Continue appropriate asthma first aid while waiting for the ambulance, following the child's plan/current instructions.
- If a child has a known risk of anaphylaxis and develops sudden breathing difficulty after possible allergen exposure, follow the child's ASCIA Action Plan and give the adrenaline device first where indicated.

UNDIAGNOSED ASTHMA OR NO AUTHORISATION AVAILABLE

If a child who is not known to have asthma develops signs consistent with an asthma emergency, educators will commence current Asthma First Aid and call 000 as indicated. Regulation 94 permits medication to be administered without prior authorisation in an anaphylaxis or asthma emergency. If medication is administered under Regulation 94, a parent and emergency services must be notified as soon as practicable.

SELF-ADMINISTRATION – SCHOOL-AGE CHILDREN

Because Cubby OOSH cares for children over preschool age, self-administration may be permitted where appropriate. Under Regulation 96, this requires authorisation recorded in the child's medication record and must be supported by the service's medical conditions policy and individual risk controls.

- The child's age, competence, understanding and ability to recognise symptoms will be considered.
- Educators remain responsible for adequate supervision and for responding if symptoms worsen or the child cannot safely self-manage.
- The location of medication must allow the child and educators to access it immediately in an emergency.

TRIGGERS AND RISK MINIMISATION

Triggers vary between children and may include respiratory infections, exercise, smoke or vaping aerosols, pollen, dust, weather changes, strong scents or other individual factors. Risk minimisation will be based on the child's plan rather than assuming the same triggers for every child.

- Maintain a smoke- and vape-free environment.
- Plan for physical activity rather than unnecessarily restricting it; allow prescribed pre-exercise medication where documented.
- Consider air quality, pollen, smoke and weather warnings when planning outdoor activity where relevant to an individual child.
- Communicate with families about changes in symptoms, treatment or known triggers.

EXCURSIONS, VACATION CARE AND EMERGENCY EVACUATIONS

- The child's reliever medication, required device/spacer and current Asthma Action Plan must accompany the child whenever they leave the service premises.
- Excursion and transportation risk assessments will consider access to medication, staff knowledge, environmental triggers, emergency communication and ambulance access.
- Medication must remain immediately accessible during transport, excursions, drills and evacuations and must not be packed where it cannot be reached quickly.

FAMILY RESPONSIBILITIES

- Inform the service on enrolment or diagnosis that their child has asthma and provide relevant health information.
- Provide a current Asthma Action Plan and advise the service promptly of changes to diagnosis, symptoms, medication or treatment.
- Provide adequate, in-date prescribed medication and required equipment.
- Work with the service to develop and review the risk minimisation and communication arrangements.
- Support their child, where developmentally appropriate, to recognise symptoms and tell an educator immediately when they need assistance.

EDUCATOR RESPONSIBILITIES

- Know which children have asthma and how to access their plans and medication.
- Recognise symptoms and act promptly; never delay emergency treatment while attempting to contact a parent.
- Follow the child's plan and current asthma first-aid guidance.
- Record medication and asthma incidents as required and notify families as soon as practicable.
- Maintain privacy and avoid unnecessarily identifying a child's medical condition to others.
- Review the effectiveness of risk controls after an asthma incident or significant change.

INCIDENTS, NOTIFICATION AND FOLLOW-UP

Asthma attacks and emergency medication administration will be documented in accordance with the National Regulations. Parents will be notified as soon as practicable. The Approved Provider will assess whether the event meets the definition of a serious incident or another prescribed notification and notify the Regulatory Authority within the applicable timeframe. An asthma event is not automatically a 24-hour Regulatory Authority notification solely because asthma medication was administered.

After a significant asthma event, the service will review the child's plan, risk minimisation strategies, medication availability, educator response and any environmental factors, in consultation with the family as appropriate.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law (NSW) - including the paramount consideration and protection from harm and hazards
- Education and Care Services National Regulations - Regulations 85–87, 90–96, 136, 162C/162D, 168, 170, 171 and 176, as applicable
- National Quality Standard - Quality Area 2: Children's Health and Safety
- Work Health and Safety Act 2011 (NSW), as applicable

SOURCES

- Australian Children's Education and Care Quality Authority (ACECQA) - Guide to the National Quality Framework; medical conditions policy guidance; approved first aid and emergency asthma management training requirements
- Asthma Australia - current Asthma First Aid resources and Asthma Action Plan
- National Asthma Council Australia - Australian Asthma Handbook
- Education and Care Services National Law and National Regulations as applied in NSW

2.13 Food Allergy & Intolerance Policy

INTRODUCTION

Food allergy is an immune-system reaction to a food protein and can range from mild or moderate symptoms to anaphylaxis, which is a medical emergency. Food intolerance does not involve the immune system and may cause symptoms such as gastrointestinal discomfort, headache or other adverse reactions. Accurate identification and individual management are important because allergy and intolerance require different responses.

PURPOSE

Cubby OOSH is committed to providing a safe, inclusive and allergy-aware environment for school-age children. The Service will minimise the risk of exposure to known food allergens and intolerances, respond promptly to allergic reactions, and work with families and health professionals to support each child's individual needs.

SCOPE

This policy applies to children, educators, staff, volunteers, students, visitors and food provided, prepared or consumed during before school care, after school care, vacation care, excursions and other OOSH activities.

Cubby OOSH adopts an allergy-aware approach. The Service will not make absolute claims that an environment is completely "allergen free" or "nut free", as accidental exposure cannot be guaranteed. Risk controls will be based on each child's documented allergy, medical management plan and risk minimisation plan.

IDENTIFYING ALLERGY AND INTOLERANCE

- Families must provide accurate information at enrolment and advise the Service promptly of any diagnosed allergy, food intolerance, dietary restriction or change in the child's health needs.
- Where a child has a diagnosed allergy or other relevant medical condition, the requirements of the Service Medical Conditions Policy apply, including a medical management plan where required under Regulation 90.
- A food intolerance that is not a diagnosed medical condition will be managed through documented dietary information and consultation with the family. The Service may request relevant medical information where necessary to safely manage the child's needs.

MEDICAL MANAGEMENT, RISK MINIMISATION AND COMMUNICATION

- For a child with a specific health care need, allergy or relevant medical condition, the Service will work with the family to develop an individual risk minimisation plan and communication plan in accordance with Regulation 90.
- The child's medical management plan must be followed if an incident occurs in relation to the child's allergy or medical condition.
- Plans, medication and emergency information will be readily accessible to educators who need them while protecting the child's privacy. Medical information will not be publicly displayed unless this is lawful, necessary and appropriately authorised.
- Educators, including casuals and relief staff, will be informed during induction/shift handover of children with relevant allergies, intolerances and emergency medication and where plans and medication are located.

FOOD AND ALLERGEN RISK MANAGEMENT

- Educators will check ingredient labels each time food is purchased or served to a child with a food allergy. Product ingredients and allergen statements can change.
- Current Food Standards Australia New Zealand plain-English allergen declarations will be used to identify relevant allergens, including wheat, fish, crustacean, mollusc, egg, milk, lupin, peanut, soy, sesame and individual tree nuts, as well as gluten-containing cereals and sulphites where declaration requirements apply.
- Food will be prepared, stored and served in a way that reduces allergen cross-contact. This includes clean hands, utensils, preparation surfaces and serving equipment, and avoiding shared utensils or food where cross-contact may occur.
- Children will be supervised during eating. Food sharing will be actively discouraged where a child has an allergy or where food contents cannot be confirmed.
- Food supplied by families, schools, external providers or for celebrations will be assessed against the child's individual plan. Where allergen safety cannot be confirmed, an appropriate alternative will be provided or the child's family consulted.
- The Service may restrict particular foods or products where this is identified as a reasonable risk minimisation strategy for an enrolled child. Any restriction will be communicated clearly to families and reviewed when circumstances change.
- Packaged food labels and supplier information will be retained or available long enough for educators to verify ingredients where needed. Food recalls involving allergens will be acted on promptly.

EMERGENCY RESPONSE

- Any child showing signs of an allergic reaction will be managed immediately in accordance with their current medical management/action plan and the Service's Anaphylaxis and Administration of First Aid policies.
- If anaphylaxis is suspected, educators will give adrenaline without delay in accordance with current first aid guidance and the child's plan, call 000 and continue emergency care. Regulation 94 permits administration of medication without prior authorisation in an anaphylaxis or asthma emergency, with required notifications made as soon as practicable.
- Parents/guardians will be notified as soon as practicable. The incident will be documented and the Approved Provider will assess whether Regulatory Authority notification is required under the National Law and Regulations.

OOSH ACTIVITIES, EXCURSIONS AND VACATION CARE

- Risk assessments for excursions, incursions, cooking experiences, celebrations and vacation care activities will consider known food allergies and intolerances, access to emergency medication, food sources, cross-contact risks and emergency response arrangements.
- A child's required medication and relevant medical management/action plan must accompany the child whenever they leave the Service premises.

RESPONSIBILITIES OF FAMILIES

- Provide current and accurate allergy/intolerance information, medical management plans and prescribed medication/equipment where relevant.
- Notify the Service promptly of changes to diagnosis, treatment, medication, food restrictions or the child's plan.

- Work with the Service to develop and review risk minimisation and communication strategies.

RESPONSIBILITIES OF EDUCATORS AND MANAGEMENT

- Know which children have allergies or intolerances and understand their individual risk controls and emergency response.
- Follow food-handling, hygiene, medication and first aid procedures and ensure emergency medication remains accessible to adults and unavailable to children, unless an authorised school-age self-administration arrangement applies.
- Review plans and risk controls when the child's circumstances change and following any allergic reaction, near miss or identified risk.
- Support children to participate without stigma or unnecessary exclusion and educate children in age-appropriate ways about not sharing food and seeking educator help if they feel unwell.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law (NSW), including the paramount consideration of children's safety, rights and best interests and reasonable precautions to protect children from harm and hazards.
- Education and Care Services National Regulations, including Regulations 77, 90, 91, 92, 93, 94, 95, 96, 136, 168, 170, 171, 173 and 183, as applicable.
- Food Standards Australia New Zealand Food Standards Code, including allergen information and declaration requirements.
- Work Health and Safety Act 2011 (NSW) and applicable food safety/public health requirements.
- National Quality Standard: Quality Area 2 - Children's Health and Safety.

SOURCES

- Australian Children's Education and Care Quality Authority (ACECQA) - Guide to the National Quality Framework and medical conditions guidance.
- Australasian Society of Clinical Immunology and Allergy (ASCIA) and National Allergy Council - current allergy and anaphylaxis guidance for schools and children's education and care services.
- Food Standards Australia New Zealand (FSANZ) - Food Allergen Portal and current plain-English allergen labelling requirements.
- Allergy & Anaphylaxis Australia - food allergy management resources.

2.14 Diabetes Policy

INTRODUCTION

Diabetes is a chronic health condition that requires individualised management. Children with diabetes may need support with glucose monitoring, food and carbohydrate intake, insulin or other medication, physical activity, treatment of low or high glucose levels and emergency care. Cubby OOSH will work with each child, their family and, where appropriate, the child's diabetes health professionals to support safe participation in the OOSH program.

PURPOSE

Cubby OOSH is committed to providing a safe, inclusive environment for children with diabetes and to ensuring that individual diabetes management requirements are understood and followed while children are attending the Service, including during excursions, vacation care, transport, evacuations and other off-site activities.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisor/Responsible Person, educators, staff, volunteers, students, children and families. It should be read with the Medical Conditions Policy, Medication Policy and Administration of First Aid Policy.

ABOUT DIABETES

Type 1 diabetes is an autoimmune condition in which the pancreas produces little or no insulin. People with type 1 diabetes require insulin. Type 2 diabetes occurs when the body does not use insulin effectively and/or does not produce enough insulin. Diabetes management varies between individuals and may include insulin injections or a pump, continuous glucose monitoring (CGM), finger-prick blood glucose checks, ketone monitoring, planned food intake and management around physical activity.

PARAMOUNT CONSIDERATION

In all decisions and actions under this policy, the safety, rights and best interests of children are the paramount consideration. Children with diabetes will be supported to participate in the program without discrimination, with reasonable adjustments and age-appropriate involvement in decisions about their care.

MEDICAL MANAGEMENT, RISK MINIMISATION AND COMMUNICATION

For a child with diabetes, Cubby OOSH will implement the requirements of Regulation 90. Before care commences, or as soon as practicable following a new diagnosis, the Service will work with the family to obtain and implement a current medical/diabetes management plan and develop a risk minimisation plan and communication plan. The plan must be followed in an incident relating to the child's diabetes.

Plans will identify the child, their usual diabetes care needs, glucose monitoring requirements and target range, insulin/medication requirements, signs and treatment of hypoglycaemia and hyperglycaemia, ketone management where relevant, physical activity considerations, emergency actions and contacts.

Risk minimisation will consider food and meal timing, physical activity, access to toilets and drinking water, storage and accessibility of medication/equipment, excursions and transport, equipment failure, emergency evacuation/lockdown and any other individual risks.

All relevant educators, including casual and relief educators, will know how to identify the child, where the current plan is kept and where medication, monitoring equipment and hypo treatment are located.

Medical information will be readily accessible to staff who need it for the child's care, while being managed in accordance with privacy and confidentiality requirements. Plans will not be publicly displayed unless this is necessary for safe care and appropriate consent/privacy safeguards are in place.

Plans will be reviewed when the child's management changes and at the review interval identified by the child's diabetes health professional. Families should provide an updated plan at least annually or whenever management changes.

MANAGEMENT / NOMINATED SUPERVISOR WILL ENSURE

Families of a child with diabetes are provided with the Service's Medical Conditions Policy in accordance with Regulation 91 and are informed of relevant service procedures.

Staffing arrangements meet Regulation 136 first aid requirements at all times children are being educated and cared for.

Employees who provide individual diabetes support have the knowledge, instruction and practical training necessary to safely carry out the child's documented plan. Training will be matched to the child's needs and may include glucose monitoring, CGM, insulin pens/pumps, carbohydrate calculations, ketone testing and glucagon where prescribed.

All educators know the signs of a diabetes emergency and how to obtain immediate assistance.

The child has timely access to their monitoring equipment, medication, insulin delivery equipment, hypo treatment and other supplies identified in their plan. If prescribed medication or essential equipment is required for safe attendance, the Service will follow the child's risk minimisation plan regarding attendance without it.

Food, snacks, water, physical activity and rest are managed in accordance with the child's plan. A child will not be unnecessarily excluded from activities because of diabetes.

Current plans, medication and required equipment accompany the child on excursions, vacation care outings, transport and emergency evacuations, with additional planning for extended or higher-risk activities.

Incidents, medication administration and first aid are documented as required by the National Regulations and Service procedures.

EDUCATORS WILL

Follow the child's current diabetes management plan, risk minimisation plan and communication plan and only perform diabetes care tasks for which they have received appropriate instruction/training.

Allow the child to check glucose levels whenever required and provide privacy if requested, while maintaining appropriate supervision.

Respond promptly to CGM alerts or symptoms in accordance with the child's plan. A child using CGM must be able to access the phone, receiver or other device needed to view glucose information, subject to the child's plan and the Service's digital device arrangements.

Ensure the child has immediate access to their hypo kit and can eat/drink or use the toilet when required for diabetes management.

Never leave a child who is experiencing significant hypoglycaemia or another diabetes emergency alone.

Communicate relevant observations, treatment and concerns to the family and document care as required.

SELF-MANAGEMENT AND SELF-ADMINISTRATION

School-age children may be able to undertake some diabetes tasks independently. The level of independence will be based on the child's age, capability, current diabetes management plan, family consultation and Service risk assessment. Where self-administration of medication is permitted for a

child over preschool age, this must be authorised by the Service's medical conditions policy and recorded in accordance with Regulation 96. Educators remain responsible for appropriate supervision and support.

FAMILIES WILL

Inform the Service of the child's diabetes at enrolment or as soon as a diagnosis is made.

Provide a current diabetes management/action plan developed with the child's diabetes health professional(s), and provide updated plans whenever management changes.

Provide sufficient in-date medication, insulin, monitoring equipment, hypo treatment, consumables and backup supplies required by the plan.

Ensure emergency contacts and relevant health professional contact details are current.

Communicate changes in the child's health, treatment, technology or support needs promptly and participate in development/review of the risk minimisation and communication plans.

HYPOGLYCAEMIA (LOW GLUCOSE)

Possible signs include shaking, sweating, pallor, hunger, dizziness, headache, irritability, confusion, weakness, behaviour change, reduced concentration, drowsiness, seizure or unconsciousness. Symptoms vary between children.

Follow the child's diabetes management/action plan immediately.

If the child is conscious and able to swallow safely, give the fast-acting carbohydrate specified in the plan, recheck glucose as directed and provide follow-up carbohydrate if required by the plan.

Do not give food or drink to a child who is unconscious, having a seizure or unable to swallow safely.

If severe hypoglycaemia occurs, place the child safely, call 000 and administer glucagon only where it is prescribed/authorised and staff are trained to do so in accordance with the child's plan and medication requirements. Continue first aid and follow emergency-service instructions.

Contact the parent/guardian as soon as practicable.

HYPERGLYCAEMIA (HIGH GLUCOSE) AND KETONES

Possible signs include thirst, frequent urination, tiredness, blurred vision, abdominal pain, nausea/vomiting or other symptoms identified in the child's plan. High glucose with ketones can become a medical emergency. Educators will follow the child's plan for glucose/ketone checks, fluids, insulin or other actions. Call 000 for severe symptoms, altered consciousness, difficulty breathing, persistent vomiting or whenever the plan or emergency services direct.

MEDICATION AND EMERGENCY AUTHORISATION

Insulin, glucagon and other diabetes medication will be administered in accordance with Regulations 92, 93 and 95, the child's current plan and the Service's Medication Policy. Regulation 94 specifically provides an exception to prior authorisation for an anaphylaxis or asthma emergency; it does not create a general diabetes emergency exception. If urgent diabetes medication is not already authorised, staff will seek verbal authorisation in accordance with Regulation 93 where practicable and contact emergency services when required.

EXCURSIONS, VACATION CARE AND TRANSPORT

Risk assessments will consider meal timing, physical activity, travel duration, temperature/storage requirements, access to toilets and water, mobile coverage, emergency access, supervision and backup diabetes supplies.

The child's current plan, medication, monitoring equipment, hypo kit and appropriate backup supplies will remain readily accessible and travel with the child, not separately in inaccessible luggage.

For camps or extended activities, additional planning and staff training will be arranged in consultation with the family and, where appropriate, the child's diabetes health professional.

INCIDENTS, RECORDS AND NOTIFICATIONS

The Service will complete medication and incident, injury, trauma and illness records as required. Parents will be notified as soon as practicable in accordance with Regulation 86 where applicable. The Approved Provider will notify the Regulatory Authority only where the incident meets the National Law/Regulations notification criteria, including a serious incident or other prescribed notification; a diabetes episode is not automatically reportable merely because it occurred.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

Education and Care Services National Law (NSW) - including the paramount consideration of children's safety, rights and best interests and reasonable precautions to protect children from harm and hazards.

Education and Care Services National Regulations - Regulations 85-87, 90-96, 136, 161-162, 168, 170-171, 176 and 183, as applicable.

Work Health and Safety Act 2011 (NSW) and applicable regulations.

Disability Discrimination Act 1992 (Cth) and Disability Standards for Education 2005, where applicable.

National Quality Standard - Quality Area 2: Children's Health and Safety.

SOURCES

ACECQA - Guide to the National Quality Framework and Quality Area 2 guidance (current 2026).

National Diabetes Services Scheme (NDSS) - Diabetes in Schools: Diabetes Management Plans, glucose monitoring, training and excursion/camp resources.

Diabetes Australia / NDSS resources for children and young people with diabetes.

Australian Diabetes Society and Australasian Paediatric Endocrine Group clinical guidance, where relevant to the child's treating team.

2.15 Sun Protection Policy

INTRODUCTION

Ultraviolet (UV) radiation can damage skin and eyes and contributes to skin cancer. Children and young people can spend significant time outdoors while attending OOSH, including during afternoon care, vacation care, excursions and outdoor programs. Cubby OOSH uses a combination of sun-protection measures whenever UV levels are 3 or above, consistent with current Cancer Council guidance.

PURPOSE

Cubby OOSH is committed to protecting children, educators, staff and visitors from overexposure to UV radiation while supporting safe, active outdoor play. Sun protection is incorporated into daily routines, the program, supervision, excursions and the physical environment.

SCOPE

This policy applies to children, educators, staff, students, volunteers and visitors participating in OOSH activities. In NSW, sun protection decisions are based on the daily UV Index rather than fixed months or clock times. When UV levels are 3 or above, multiple forms of sun protection will be used.

PARAMOUNT CONSIDERATION

In all decisions and actions under this policy, the safety, rights and best interests of children are the paramount consideration. Sun-protection practices will be implemented in ways that maintain children's dignity, inclusion, agency and access to meaningful outdoor play.

IMPLEMENTATION

Daily UV monitoring

- Educators will check the current and forecast UV Index and recommended sun-protection times using a reliable source such as the SunSmart app, Bureau of Meteorology or Cancer Council information.
- When UV levels are 3 or above, children and educators will use a combination of protective clothing, sunscreen, sun-safe hats, shade and, where practical, sunglasses.
- When UV levels are below 3, routine sun protection is generally not required unless advised for an individual child or where prolonged or high-reflection exposure warrants additional protection.

Outdoor play, shade and supervision

- Outdoor play will remain an important part of the OOSH program. Activities will be planned to make effective use of available shade when UV levels are 3 or above, particularly during peak UV periods.
- The service will use available natural, built and portable shade and monitor whether shaded areas are adequate for the number of children and activities being offered.
- Where adequate shade is not available or UV conditions create an unacceptable risk, activities may be relocated, modified or moved indoors.
- Children will have access to drinking water and educators will monitor hydration, heat and individual wellbeing during outdoor activities.

Hats, clothing and sunglasses

- Sun-safe hats protect the face, ears and neck. Broad-brimmed, bucket or legionnaire-style hats are preferred. Baseball caps and visors are not considered sun-safe hats because they do not adequately protect the ears and neck.
- When UV levels are 3 or above, children without a sun-safe hat will be supported to use a service spare hat where available or participate in activities in a well-shaded or covered area. Children will not be excluded from outdoor play as a punishment for not having a hat.
- Children and educators are encouraged to wear clothing that covers as much skin as practical, including shoulders and upper arms.
- Sunglasses may be worn and should meet Australian Standard AS/NZS 1067 and fit closely to the face where practicable.

Sunscreen

- Cubby OOSH will provide SPF50 or SPF50+ broad-spectrum, water-resistant sunscreen. Sunscreen will be applied to exposed skin approximately 20 minutes before outdoor exposure when practicable and reapplied at least every 2 hours, and after swimming, heavy sweating or when rubbed or washed off.
- Families may apply sunscreen before arrival and must advise the service of any known sunscreen allergy, sensitivity or medical restriction. Where a child requires a particular product, families may be asked to provide it clearly labelled.
- School-age children will be encouraged to develop independence in applying sunscreen, with educator reminders, supervision and assistance appropriate to their age, ability and needs.
- Where educators assist with application, hygienic practices will be used to minimise cross-contamination. Gloves are not routinely required unless indicated by infection-control or individual circumstances.
- Sunscreen will be stored according to manufacturer directions and expiry dates checked. Service sunscreen will be TGA-compliant and suitable for its intended use.
- Sunscreen application may be recorded through the service's approved documentation system where required by service procedure, particularly during vacation care and excursions.

Excursions, vacation care and transport

- Sun and UV exposure will be considered in excursion and regular-outing risk assessments, including destination, shade, duration outdoors, water activities and access to sunscreen, hats and drinking water.
- For excursions and vacation care, educators will check expected UV conditions and ensure appropriate sun-protection supplies are available. Sun protection will continue during transport-related activities where children may be exposed to UV.

Children's participation and education

- Educators will model positive sun-safe practices and support children to understand the UV Index and the "Slip, Slop, Slap, Seek, Slide" message.
- Children will be involved in age-appropriate decisions about shade, outdoor activity locations and sun-safe routines. Educators will avoid shaming or punitive approaches and support practical alternatives when a child does not have suitable sun protection.

Families will

- Provide or support access to a sun-safe hat and suitable clothing for outdoor OOSH activities.

- Inform the service of sunscreen allergies, sensitivities or other health needs that affect sun protection and provide an alternative sunscreen where required.
- Support children to understand and participate in the service's sun-protection practices.

Management / Nominated Supervisor will

- Ensure this policy is available to educators and families and that educators understand service sun-protection procedures.
- Ensure daily practice reflects current recognised sun-protection guidance and that adequate sunscreen and reasonable access to shade are maintained.
- Review sun-protection risks when planning outdoor environments, excursions, vacation care and significant changes to service practice.
- Notify families of changes to this policy in accordance with the National Regulations where notification requirements apply.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law (NSW) - section 167: protection from harm and hazards.
- Education and Care Services National Regulations - regulations 100-101 (excursion risk assessment), regulation 114 (outdoor space - shade, where applicable), regulation 168(2)(a)(ii) (sun protection policy and procedures), regulation 170 (policies and procedures to be followed), regulation 171 (policies and procedures to be kept available) and regulation 172 (notification of change to policies or procedures).
- Work Health and Safety Act 2011 (NSW), as applicable.
- National Quality Standard - Quality Area 2: Children's health and safety; Quality Area 3: Physical environment; Quality Area 7: Governance and leadership.

SOURCES

- Australian Children's Education and Care Quality Authority (ACECQA) - Sun Protection Policy Guidelines and Guide to the National Quality Framework.
- Cancer Council NSW / SunSmart - current UV and sun-protection guidance, including SPF50 or SPF50+ broad-spectrum, water-resistant sunscreen and multiple sun-protection measures when UV is 3 or above.
- Bureau of Meteorology - UV Index and daily sun-protection times.

2.16 Food & Nutrition Policy

INTRODUCTION

Cubby OOSH recognises that nutritious food, safe food handling and positive mealtime experiences support school-age children's health, wellbeing, learning and participation. Our approach is guided by the Australian Dietary Guidelines, the Australian Guide to Healthy Eating, NSW Health OOSH healthy-living resources and the National Quality Standard.

PURPOSE

To ensure food and beverages provided, prepared or served by Cubby OOSH are nutritious, appropriate for school-age children, safely handled, inclusive of individual needs, and offered in a positive environment that supports children to develop healthy relationships with food.

SCOPE

This policy applies to children, educators, staff, volunteers and students at before school care, after school care, vacation care, excursions and other service activities where food or beverages are provided, prepared, handled or consumed.

PARAMOUNT CONSIDERATION

The safety, rights and best interests of children are the paramount consideration in decisions about food, nutrition, allergies, dietary needs, food preparation and mealtime practices.

HEALTHY FOOD AND DRINK

- Where Cubby OOSH provides food or beverages, they will be nutritious, varied and appropriate for the age, dietary needs and circumstances of the children, consistent with Regulations 78 and 79.
- Menus and snacks will be informed by the Australian Dietary Guidelines and Australian Guide to Healthy Eating, with water promoted as the main drink.
- Children will have access to safe drinking water at all times.
- School-age children will be offered sufficient food and reasonable opportunities to eat according to the length and timing of the session, including before school, after school and vacation care.
- The service will not apply a blanket requirement that OOSH food provide a fixed percentage of a child's daily nutrient intake. Menu planning will instead reflect the foods and meals provided during the child's actual period of attendance.
- Highly processed foods and drinks high in added sugar, saturated fat or salt will be limited. Food will not be used as a reward, bribe, punishment or behaviour-management tool.

MENUS

Where the service provides food and beverages, an accurate weekly menu describing the food and beverages to be provided each day will be displayed in a place accessible to families, as required by Regulation 80.

Menu changes will be recorded or communicated so the displayed information remains accurate.

Children's ideas and feedback may be included in menu planning, cooking experiences and evaluation of meals and snacks.

Menus will consider cultural, religious, ethical and family dietary practices, while maintaining food safety and meeting children's nutritional needs.

FOOD BROUGHT FROM HOME

Where children bring food from home, families will be provided with practical information about nutritious lunchbox and snack choices appropriate to OOSH.

Educators will not shame, label or rank children's food as 'good' or 'bad'. Healthy choices will be encouraged through respectful discussion, modelling and education.

Food brought from home will be managed in accordance with relevant allergy, medical condition and food-safety requirements.

ALLERGIES, INTOLERANCES AND SPECIAL DIETARY REQUIREMENTS

Children's diagnosed food allergies and relevant medical conditions will be managed in accordance with the Medical Conditions, Anaphylaxis and Food Allergy & Intolerance policies, the child's medical management plan, risk minimisation plan and communication plan.

Dietary requirements that are not medical conditions, including vegetarian, cultural, religious or family preferences, will be documented and communicated to relevant educators and food handlers.

Children will not share food, drinks, utensils or food containers where this creates an allergy or medical risk.

Ingredient labels will be checked when required for a child's allergy or dietary plan. Food will be prepared and served to minimise cross-contact, including appropriate hand hygiene, clean equipment, clean food-contact surfaces and separate utensils or preparation processes where needed.

A child will not be isolated from peers solely because of an allergy or dietary requirement unless an individual risk assessment identifies that separation is necessary for safety. Inclusive alternatives will be used wherever practicable.

SAFE FOOD HANDLING AND HYGIENE

Food will be received, stored, prepared, displayed, transported and served in accordance with the Australia New Zealand Food Standards Code, applicable NSW food laws and the service's hygiene procedures.

Potentially hazardous food will be kept at 5°C or colder or 60°C or hotter unless a documented safe alternative time/temperature control is being used.

Raw foods will be kept separate from ready-to-eat foods. Food-contact surfaces, utensils and equipment will be cleaned and, where required, sanitised between uses.

Educators, children and other food handlers will wash and dry their hands at appropriate times. Gloves or utensils may be used for ready-to-eat food where appropriate; gloves do not replace handwashing and must be changed when contaminated.

Food handlers who are unwell with symptoms that may contaminate food will not undertake food handling duties until it is safe for them to do so.

Fridge and freezer temperatures will be monitored as part of the service's food-safety procedures. Corrective action will be taken where food cannot be kept safely.

FOOD SAFETY TRAINING AND SUPERVISION

People undertaking or supervising food handling will have food-safety and hygiene skills and knowledge appropriate to their duties.

Where Standard 3.2.2A of the Australia New Zealand Food Standards Code applies to a service's food activities, Cubby OOSH will meet the applicable requirements for food-handler training, a certified Food Safety Supervisor and any required evidence of critical food-safety controls.

The Approved Provider/Nominated Supervisor will confirm the food-business and Food Safety Supervisor requirements that apply to each service with the relevant NSW food regulator or local council, because requirements depend on the food activities undertaken.

POSITIVE MEALTIME PRACTICES AND CHILDREN'S AGENCY

Mealtimes will be relaxed, social and adequately supervised, with children given enough time to eat.

Children will be encouraged to listen to hunger and fullness cues. Educators will not force children to eat, finish food or try a particular food.

Children may participate in age-appropriate food preparation, serving, menu planning and pack-up where risks have been assessed and safe food practices are followed.

School-age children will be supported to develop independence and food literacy while educators maintain appropriate supervision and safety.

Children's cultural identities and family practices will be respected and represented sensitively in food experiences and menus.

COOKING EXPERIENCES

Cooking activities will be planned with consideration of allergies, dietary requirements, hygiene, equipment, heat, sharp implements and supervision.

Children will receive developmentally appropriate instruction and supervision before using kitchen equipment or participating in food preparation.

Food prepared by children for consumption will be handled in accordance with the same food-safety requirements as other food served by the service.

EXCURSIONS, TRANSPORT AND VACATION CARE

Food provided or carried on excursions, transport and vacation-care activities will be stored and transported safely, including temperature control where required.

Relevant allergy and medical information, medication and emergency plans will accompany the child in accordance with the service's medical conditions and excursion procedures.

The service will plan for adequate drinking water and suitable food options for the duration and conditions of the activity.

FAMILY COMMUNICATION

Families will be asked at enrolment and whenever circumstances change to provide current information about allergies, medical conditions, intolerances and dietary requirements.

Families will be informed about the service's menu, food practices and relevant allergy-management arrangements and will be encouraged to provide feedback.

Information about a child's health or dietary needs will be shared only with people who need the information to safely care for the child, consistent with privacy and confidentiality requirements.

RESPONSIBILITIES

The Approved Provider/Nominated Supervisor will:

ensure this policy is implemented, reviewed and available to educators and families;

ensure food-safety responsibilities, training and supervision arrangements are understood;

ensure menus, food-safety records and relevant child dietary information are maintained as required; and

review food-related incidents, complaints, allergy risks and identified hazards and implement corrective actions.

Educators and food handlers will:

follow this policy and the child-specific medical, allergy and dietary information available to them;

maintain safe food handling, hygiene and supervision practices;

promote respectful, inclusive and positive mealtime experiences; and

report food-safety concerns, contamination, allergic reactions or other incidents promptly.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

Education and Care Services National Law (NSW), including section 167 and the paramount consideration requirements.

Education and Care Services National Regulations (NSW), including Regulations 77, 78, 79, 80, 90–96, 162, 168, 170, 171 and 183, as applicable.

National Quality Standard: Quality Area 2 – Children's Health and Safety, including Element 2.1.3 Healthy lifestyle.

Food Act 2003 (NSW) and Food Regulation 2025 (NSW), as applicable.

Australia New Zealand Food Standards Code, including Standards 3.2.2, 3.2.2A and 3.2.3, as applicable.

Work Health and Safety Act 2011 (NSW) and applicable regulations.

SOURCES

Australian Children's Education and Care Quality Authority (ACECQA) – National Quality Framework and Quality Area 2 guidance.

NSW Health – Healthy living in Out of School Hours Care / Eat Smart Play Smart resources.

Australian Government – Australian Dietary Guidelines and Australian Guide to Healthy Eating.

Food Standards Australia New Zealand (FSANZ) – Food Safety Standards and Safe Food Australia.

NSW Food Authority – food safety guidance for NSW food businesses.

NHMRC – Staying Healthy: Preventing infectious diseases in early childhood education and care services, 6th edition (2024), where relevant to hygiene and infection prevention.

2.17 Sleep and Rest Time Policy

PURPOSE

Cubby OOSH will take reasonable steps to ensure every child has appropriate opportunities for sleep, rest and relaxation having regard to their age, developmental stage, individual needs, health care needs, cultural preferences and family requests. Children's safety, rights and best interests are the paramount consideration in all sleep and rest decisions and practices.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisor, Responsible Person, educators, staff, students, volunteers, visitors and children attending before school care, after school care, vacation care, excursions and transport where applicable.

OOSH APPROACH TO SLEEP, REST AND RELAXATION

School-age children may need or choose to sleep, rest or relax for many reasons, including tiredness after school or an excursion, long periods in care, illness, neurodiversity, a medical condition, self-regulation needs or individual preference. Cubby OOSH will provide safe, comfortable options without requiring children to sleep or participate in a compulsory rest period.

- Educators will recognise and respond to children's cues, such as yawning, disengaging from play, seeking quiet, reduced energy or difficulty regulating emotions.
- Children will be supported to exercise agency and make age-appropriate choices about sleep, rest and relaxation. Children who do not wish to sleep will have access to suitable quiet or active experiences that do not unnecessarily disrupt children who are resting.
- Families will be consulted about individual needs, health care needs, cultural preferences and relevant routines. Family requests will be considered alongside the child's expressed needs, safety and current evidence-based guidance.
- No child will be forced, restrained, threatened, shamed or subjected to inappropriate discipline or inappropriate conduct to make them sleep or rest.

SLEEP AND REST RISK ASSESSMENT

The Approved Provider will ensure a sleep and rest risk assessment is conducted in accordance with Regulation 84C. It will be completed at least once every 12 months and as soon as practicable after the service becomes aware of a circumstance that may affect the safety, health or wellbeing of children during sleep or rest.

The assessment will identify hazards and evaluate risks specific to the service context, including before school care, after school care, vacation care, shared or pack-away school environments, excursions and transport. It will consider:

- the number, ages, developmental stages and individual sleep and rest needs of children;
- specific health care needs, cultural preferences and requests from families;
- staffing arrangements, supervision, educator knowledge and training;
- the location and physical environment of sleep/rest areas, including visibility, access, temperature, lighting and ventilation;
- the safety and suitability of furniture, cushions, bean bags, bedding or other equipment;

- hazards within the environment or on a child, including items that may interfere with safe supervision;
- the method and frequency of physical checks and how sleep/rest periods will be documented; and
- risks arising when a child falls asleep during transport or an excursion, including transition out of a vehicle and ongoing supervision.

Control measures identified by the risk assessment will be implemented and reflected in service procedures. Risk assessments and associated records will be retained in accordance with the National Regulations.

SUPERVISION AND MONITORING

- Adequate supervision will be maintained at all times. Sleeping children will be positioned so educators can effectively observe and respond to them.
- Educators will physically check sleeping children at a frequency determined by the service risk assessment and the child's individual circumstances. A blanket 10-minute interval is not imposed by this policy; higher-risk circumstances may require more frequent or continuous observation.
- Physical checks will allow educators to assess the child's breathing, skin colour, comfort, position and general wellbeing. Sleep/rest spaces must not be so dark, obstructed or noisy that effective supervision is compromised.
- An educator will remain within effective sight and hearing of sleeping children as required by the supervision plan and risk assessment. Educators will not undertake tasks that prevent them from adequately supervising sleeping or resting children.
- Where a child is unwell and needs to rest, educators will also follow the service's illness, incident and medical-condition procedures and arrange collection or emergency assistance where required.

SAFE SLEEP AND REST ENVIRONMENT

- A safe, quiet and appropriately supervised area will be available for children who wish or need to sleep, rest or regulate away from the main group.
- Furniture and equipment used for sleep or rest will be safe, clean, in good repair, suitable for the child and arranged so it does not obstruct supervision or create trip, entrapment, suffocation or other hazards.
- Temperature, ventilation, lighting and clothing will be considered for comfort and safety. Children may be encouraged to remove bulky outerwear, hats or shoes where appropriate and safe.
- Sleeping children's faces will remain uncovered. Hazards identified by the risk assessment, including unsafe jewellery, cords, objects, bulky items or inappropriate bedding, will be removed or managed.
- The environment will remain free from tobacco and vape smoke, drugs and alcohol in accordance with regulatory requirements.
- For school-age children, cushions, bean bags, mats or comfortable seating may form part of a rest space only where the service has assessed them as safe and suitable and supervision remains effective.

CHILDREN WITH ADDITIONAL OR MEDICAL NEEDS

Where a child's disability, medical condition, medication, fatigue, neurodiversity or other individual circumstance affects sleep or rest, educators will work with the family and, where relevant, the child's medical management or support plan. Individual risk controls and reasonable adjustments will be implemented without unnecessarily excluding the child from the program.

TRANSPORT, EXCURSIONS AND VACATION CARE

Educators will anticipate that children may fall asleep during transport or excursions, particularly after long or physically demanding activities.

A sleeping child in a vehicle will remain adequately supervised and will never be left unattended. Vehicle checks and transition procedures must ensure every child exits the vehicle and is accounted for.

If a child remains tired after transport or an excursion, educators will provide a safe opportunity to continue resting once back at the service or destination.

DOCUMENTATION

Where a child sleeps, educators will document the sleep/rest period and monitoring required by the service's procedure and risk assessment. Records may include the time sleep commenced and ended, physical wellbeing checks, relevant observations and any action taken. Significant wellbeing concerns will be communicated to families and documented under applicable service procedures.

RESPONSIBILITIES

The Approved Provider/Nominated Supervisor will:

ensure Regulations 84A, 84B, 84C and 168 requirements are implemented and the policy/procedure reflects the current sleep and rest risk assessment;

ensure educators, casual staff, students and volunteers receive appropriate induction and information about sleep/rest responsibilities, supervision and current guidance;

ensure adequate staffing and supervision arrangements are maintained;

ensure identified risks are controlled and the policy/procedure is updated when required; and

ensure families and children are given meaningful opportunities to contribute to review of sleep/rest practices.

Educators will:

know and follow this policy, the sleep/rest procedure and relevant risk controls;

respond to each child's cues and support their agency, comfort, dignity and individual needs;

maintain adequate supervision and conduct/document physical checks as required;

check the rest environment and equipment before and during use and remove or report hazards; and

communicate relevant observations and changes in a child's sleep/rest needs to families and the Nominated Supervisor.

Families will:

provide current information about their child's sleep/rest needs, medical or health care needs, cultural preferences and relevant routines; and

inform the service of changes that may affect the child's safety or wellbeing during sleep or rest.

CONTINUOUS IMPROVEMENT

This policy, procedure and sleep/rest risk assessment will be reviewed at least annually and earlier following a relevant incident, identified risk, regulatory or evidence-based guidance change, or a material change to the service environment or practices. Children's and families' feedback will inform review. Families will be notified of policy changes in accordance with Regulation 172.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

Children (Education and Care Services) National Law (NSW): sections 165 (adequate supervision), 166 and 166A (inappropriate discipline/conduct) and 167 (protection from harm and hazards), as applicable.

Education and Care Services National Regulations: Regulations 82, 84A, 84B, 84C, 84D, 103, 105, 110, 168, 170, 171, 172 and 183, as applicable.

National Quality Standard: Quality Area 2, including Element 2.1.1 Wellbeing and comfort; and relevant Quality Area 3 requirements for safe, fit-for-purpose environments.

Work Health and Safety Act 2011 (NSW) and applicable regulations.

SOURCES

ACECQA - Sleep and rest for children policy guidelines and QA2 sleep and rest legislative requirements (current 2026 guidance).

NSW Early Learning Commission / NSW Department of Education - Safe sleep and rest and Compliance focus: sleep and rest in OOSH (updated 2026).

Red Nose Australia - evidence-based safe sleep guidance, where relevant to the age and circumstances of children attending the service.

My Time, Our Place: Framework for School Age Care in Australia, Version 2.0.

Australian Competition and Consumer Commission / Product Safety Australia - applicable sleep and rest equipment safety information.

2.18 Clothing Policy

INTRODUCTION

Clothing and footwear can affect a child's safety, comfort, dignity, independence and ability to participate fully in the OOSH program. Cubby OOSH supports school-age children to make age-appropriate choices about clothing while taking reasonable precautions to protect them from foreseeable harm and hazards.

PURPOSE

To provide clear, inclusive and practical expectations for clothing, footwear, hats and personal items so children can safely and comfortably participate in before school care, after school care, vacation care, excursions and other OOSH experiences.

SCOPE

This policy applies to children, educators, staff, volunteers, students, families and visitors where relevant to activities conducted by Cubby OOSH.

PARAMOUNT CONSIDERATION

Children's safety, rights, dignity and best interests are the paramount consideration. Clothing decisions will balance safety with children's agency, cultural identity, religious practices, disability, sensory needs, gender expression, comfort and participation.

GENERAL CLOTHING

- Children should wear comfortable, practical clothing that allows them to move freely and participate in the program, including active play, sport, creative experiences and outdoor activities.
- Clothing should be suitable for the weather and activity. Educators will monitor conditions and children's comfort and support children to add or remove layers where appropriate.
- Families are encouraged to provide clothing that children can manage independently, particularly for toileting and changing, while recognising that some children may require assistance or reasonable adjustments.
- Children may wear clothing that reflects their culture, religion, identity or personal preferences unless a specific item presents a foreseeable safety risk. Where a risk is identified, educators will work respectfully with the child and family to find a safe alternative.
- Children will not be excluded from an activity simply because clothing may become dirty. Aprons, protective clothing or reasonable alternatives will be offered for messy, cooking, gardening and art experiences.
- Clothing and personal items should be clearly labelled where practicable. The service is not responsible for normal loss or damage to personal clothing or belongings, but reasonable care will be taken.

SUN-PROTECTIVE CLOTHING AND HATS

- When the UV Index is forecast to reach 3 or above, Cubby OOSH will use multiple sun-protection measures in accordance with the service's Sun Protection Policy.
- Families are encouraged to provide cool, loose-fitting, closely woven clothing that covers as much skin as practicable, such as shirts with sleeves and higher necklines.
- Sun-safe hats include broad-brimmed, bucket and legionnaire-style hats that protect the face, ears and neck. Baseball caps and visors provide limited protection and are not considered the preferred sun-safe option.
- Where a child does not have a sun-safe hat or suitable protective clothing, educators will provide or encourage available alternatives such as a spare hat, protective clothing, shade or modified outdoor participation rather than applying a punitive 'no hat, no play' approach.
- Educators will model sun-safe clothing and hat practices when sun protection is required.

FOOTWEAR

- Footwear should be appropriate to the activity and environment and allow the child to move safely and comfortably.
- Closed, secure footwear may be required for particular activities, excursions, sports, cooking or environments where the risk assessment identifies hazards to feet or an increased slip, trip or injury risk.
- The service will not impose a blanket ban on a particular footwear style solely by name. Educators will assess the actual activity, environment and individual child's needs and apply reasonable risk controls.
- Where footwear is unsuitable for a planned activity, educators will offer a safe alternative activity or other reasonable control where practicable and communicate with the family when needed.

WEATHER AND EXTREME CONDITIONS

- In hot weather, children will be supported to wear lightweight, breathable clothing, use shade, drink water regularly and modify strenuous activity where necessary.
- In cold or wet weather, children will be encouraged to wear suitable layers and weather-protective clothing. Wet clothing will be changed where practicable to maintain comfort and wellbeing.
- Activities may be modified, relocated or postponed when weather conditions make participation unsafe, regardless of clothing.

REST AND RELAXATION

- Children who choose or need to rest will be supported to make themselves comfortable in accordance with the Sleep and Rest Time Policy.
- Bulky outerwear, hats, shoes, jewellery or other items may be removed during sleep or rest where the sleep/rest risk assessment or individual circumstances identify a safety or comfort concern.
- Children will not be required to remove clothing unnecessarily, and their privacy and dignity will be maintained.

JEWELLERY, ACCESSORIES AND PERSONAL ITEMS

- Jewellery and accessories are not automatically prohibited. Educators will consider whether an item creates a foreseeable risk in the activity or environment, including snagging, choking, strangulation, impact or loss.
- Items identified as unsafe for a particular activity may be temporarily removed with the child's knowledge and stored securely where practicable.
- Cultural, religious, medical and identity-related items will be treated respectfully. Individual risk assessment and reasonable adjustments will be used where required rather than automatic removal.

SPARE CLOTHING AND CHANGING

- The service will maintain reasonable access to spare clothing where practicable for accidents, water play, weather changes or other unexpected needs.
- When a child needs to change clothing, educators will protect the child's privacy and dignity and provide assistance appropriate to the child's age, independence and individual needs.
- Any intimate care or toileting assistance will be provided in accordance with relevant service policies and child-safe practices.
- Families may be asked to return service-owned spare clothing clean after use.

EXCURSIONS AND VACATION CARE

- Families will be advised of activity-specific clothing and footwear requirements before excursions, incursions or vacation-care activities where practicable.
- Risk assessments will consider clothing, footwear, weather, sun exposure, terrain, water activities, protective equipment and any child-specific needs.
- Where specialist protective equipment is required, such as helmets or lifejackets, it will be used in accordance with the activity risk assessment and applicable safety requirements.

EDUCATORS, VOLUNTEERS AND VISITORS

- Educators and staff will wear clothing and footwear that are safe and appropriate for their duties and enable active supervision and participation with children.
- Educators will model sun-protective practices and comply with workplace health and safety requirements.
- Visitors and family members participating in service activities or excursions will be encouraged to follow relevant safety and sun-protection requirements.

FAMILY COMMUNICATION

- Families will be informed of clothing and footwear expectations at enrolment and when activity-specific requirements arise.
- Educators will communicate respectfully with families where clothing or footwear creates a recurring safety, health or participation concern.

- Where a child has disability, sensory, medical, cultural or other individual clothing needs, the service will consult with the child and family to identify reasonable and safe adjustments.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Children (Education and Care Services) National Law (NSW), including the requirement that children's rights and best interests are paramount and section 167 - protection from harm and hazards.
- Education and Care Services National Regulations (NSW), including Regulation 84B where clothing or items on a child may create a sleep/rest hazard; Regulations 100-102 for excursion risk assessment as applicable; Regulation 168(2)(a)(ii) - sun protection; and Regulations 170-171 concerning following policies and procedures.
- Work Health and Safety Act 2011 (NSW) and applicable regulations.
- National Quality Standard: Quality Area 2 - Children's Health and Safety and Quality Area 3 - Physical Environment.

SOURCES

- Australian Children's Education and Care Quality Authority (ACECQA) - National Quality Framework guidance.
- NSW Early Learning Commission - child safety and OOSH regulatory guidance.
- Cancer Council NSW / SunSmart - current sun-protective clothing and hat guidance.
- Cubby OOSH 2.15 Sun Protection Policy and 2.17 Sleep and Rest Time Policy.

2.19 Biting Policy

INTRODUCTION

Biting can occur when a child is overwhelmed, frustrated, communicating a need, seeking sensory input, responding impulsively or experiencing difficulty regulating emotions. In OOSH, biting by a school-age child is not treated as a normal or inevitable behaviour. Each incident will be responded to promptly, respectfully and individually, with priority given to the safety, dignity and wellbeing of all children.

PURPOSE

To provide a child-safe, trauma-aware and consistent approach to preventing and responding to biting incidents, providing first aid, communicating with families, documenting incidents, protecting confidentiality and supporting positive behaviour without shame, punishment or exclusionary practices unless required to manage an unacceptable safety risk.

SCOPE

This policy applies to children, educators, staff, volunteers, students and relevant visitors across before school care, after school care, vacation care, excursions and other Cubby OOSH activities.

PARAMOUNT CONSIDERATION

The safety, rights and best interests of children are the paramount consideration. Responses to biting will protect the child who has been bitten while also preserving the dignity and rights of the child who initiated the bite. No child will be labelled as a “biter”, humiliated, threatened, yelled at, physically punished, isolated as punishment or subjected to inappropriate discipline or inappropriate conduct.

IMMEDIATE RESPONSE TO A BITING INCIDENT

- Separate the children calmly and ensure immediate safety. Attend first to the child or person who has been bitten while maintaining appropriate supervision of all children.
- Assess the injury and provide first aid. If there is bleeding, use standard precautions, wear disposable gloves where available, control bleeding and dress the wound as appropriate. Clean blood or other body-fluid contamination in accordance with the service Hygiene and First Aid procedures.
- If the skin is broken, the wound is deep, there is significant bleeding, the bite is to a high-risk area, or there are other concerns, the Nominated Supervisor/Responsible Person will recommend prompt medical assessment. Call 000 for a serious or life-threatening injury.
- Comfort and reassure both children. Once calm, support the child who initiated the bite to communicate what happened and identify safer ways to express needs, frustration or strong emotions.
- Do not require an immediate apology, public discussion or forced reconciliation. Restorative conversations may occur later when children are regulated and willing to participate.

HUMAN BITES, BLOOD AND INFECTION CONTROL

- All blood and body fluids will be treated as potentially infectious. Educators will follow standard precautions, hand hygiene and safe wound/body-fluid procedures consistent with NHMRC Staying Healthy, 6th edition.
- Educators will not disclose another child's diagnosis, infectious disease status or private health information to a family. Where a blood exposure or broken-skin bite creates a health concern, the family of the injured child will be advised to seek medical advice and will be given relevant information about the incident without identifying or disclosing confidential information about another child.
- The service will seek advice from appropriate health authorities where required and follow any public-health directions.

FAMILY NOTIFICATION AND INCIDENT RECORDS

- The parent or authorised nominee of a child who is injured will be notified as soon as practicable and no later than 24 hours after the occurrence, consistent with Regulation 86.
- Families of the child who initiated the bite will also be informed as soon as practicable where appropriate to support behaviour guidance and risk management.
- An Incident, Injury, Trauma and Illness Record will be completed in accordance with Regulation 87 and service procedures. Records will be factual, objective and confidential.
- The identity and personal information of another child will not be disclosed in another child's incident record or to another family.
- The Approved Provider/Nominated Supervisor will assess whether the incident meets the criteria for notification to the Regulatory Authority as a serious incident or other prescribed matter and will notify within the applicable timeframe where required.

UNDERSTANDING AND PREVENTING REPEATED BITING

Where biting occurs, educators will consider the context rather than assuming deliberate misconduct. Possible contributing factors may include communication difficulty, sensory needs, impulsivity, fatigue, hunger, conflict, frustration, crowding, transitions, peer dynamics, disability, developmental needs, trauma or emotional dysregulation.

- Observe and document patterns such as time, location, activity, peers involved, triggers, warning signs, successful supports and environmental factors.
- Adjust the environment, routines, groupings, transitions or supervision where these contribute to risk.
- Provide sufficient engaging resources and appropriate space and reduce unnecessary waiting, crowding and competition for high-interest resources.
- Teach and model safe replacement behaviours such as asking for space, seeking educator help, using agreed words or visual supports, taking a break, moving away or using an appropriate sensory strategy.

- Use co-regulation, calm communication, visual supports and individualised strategies appropriate to the child's age, abilities and communication style.

- Increase active supervision where patterns or warning signs indicate a foreseeable risk, while avoiding unnecessary restriction or stigmatisation of the child.

WHEN BITING CONTINUES OR RISK INCREASES

- The Nominated Supervisor will review incident patterns, supervision and existing controls and consult with the child and family about additional strategies.

- Where appropriate, an individual behaviour support/risk management plan will be developed or updated. The plan will identify triggers, preventative strategies, replacement skills, supervision arrangements, responses to incidents and review dates.

- With family consent and where beneficial, the service may collaborate with the school, inclusion professionals, allied health practitioners or other relevant supports.

- Any decision to restrict participation, suspend or exclude a child will be a last resort, based on an individual safety assessment and relevant service policies, after reasonable strategies and supports have been considered, except where immediate action is necessary to protect children from serious harm.

EDUCATOR RESPONSIBILITIES

- Maintain active supervision and respond early to signs of escalating conflict or dysregulation.

- Use respectful, developmentally appropriate behaviour guidance and comply with the Interactions with Children and Behaviour Guidance policies.

- Never bite a child back, encourage another child to retaliate, use physical punishment, threaten, shame, ridicule, yell at or deliberately isolate a child as a response to biting.

- Seek support from another educator or the Nominated Supervisor when strategies are not effective or risk is escalating.

- Maintain confidentiality and use objective, non-judgemental language in conversations and documentation.

- Participate in reflection and review after repeated or significant incidents to identify improvements to practice, environment and supervision.

FAMILY RESPONSIBILITIES

- Provide relevant information about the child's communication, behaviour, disability, sensory needs, medical needs or effective support strategies that may assist the service to safely support the child.

- Work collaboratively with educators where repeated incidents require an individual support or risk-management approach.

- Inform the service of relevant changes that may affect the child's wellbeing or regulation while attending OOSH.

CHILDREN'S RIGHTS, AGENCY AND CONFIDENTIALITY

- Children will be listened to and supported to contribute to solutions in a way appropriate to their age, communication and understanding.

- The child who was bitten will be supported to feel safe and have their concerns taken seriously. The child who initiated the bite will be supported to learn safer skills without being defined by the behaviour.

- Information will be shared only with people who need it to provide safe care or meet legal obligations.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Children (Education and Care Services) National Law (NSW), including sections 165 (adequate supervision), 166 (inappropriate discipline), 166A (inappropriate conduct, from 27 February 2026), 167 (protection from harm and hazards) and the paramount consideration requirements.

- Education and Care Services National Regulations (NSW), including Regulations 74, 85-87, 155, 156, 168, 170, 171, 176 and 183, as applicable.

- National Quality Standard: Quality Area 2 - Children's Health and Safety; Quality Area 5 - Relationships with Children; and Quality Area 6 - Collaborative Partnerships with Families and Communities.

- Work Health and Safety Act 2011 (NSW) and applicable regulations.

SOURCES

- Australian Children's Education and Care Quality Authority (ACECQA) - Guide to the National Quality Framework and current guidance on interactions with children, inappropriate discipline and inappropriate conduct.

- National Health and Medical Research Council (NHMRC) - Staying Healthy: Preventing infectious diseases in early childhood education and care services, 6th edition (2024), including wound, blood and body-fluid guidance.

- NSW Department of Education - current education and care regulatory and child-safe guidance.

- My Time, Our Place: Framework for School Age Care in Australia, Version 2.0.

2.20 Supervision Policy

INTRODUCTION

The care and education offered at our services involves meaningful, purposeful and careful interactions with children at all times. Every experience is a potential learning experience from nappy changing to reading. Children will be encouraged to explore, be curious and make decisions about what they do. Children will be supervised at all times, both inside and outside. They will be encouraged to use and explore the variety of spaces available to them and have a context and understanding of where they are, where the centre is in relation to the rest of the community. Constant supervision and the whereabouts of children at all times is critical part of the educator's duty of care, and to ensure that adequate supervision is in line with the Education and Care National Regulations 2011.

PURPOSE

Cubby OOSH Educators have a duty of care to actively care for, interact with and supervise the children in their care at all times whether they are indoors, outdoors, using the toilets or on excursions. Every child in Cubby OOSH services will be in the care of an educator and that person is responsible for the safety and wellbeing of that child during the time they spend in our care. Children will be supervised constantly, actively, positively, respectfully and diligently.

SCOPE

- The education and care service maintains a safe and secure environment where children are free to explore and learn more about their world.
- The approved provider and educators are familiar with regulatory requirements and standards regarding supervision.
- The education and care service encourages educators to evaluate their supervisory practices and implement plans that increase their awareness of the layout, risk management and supervisory choices within the education and care environment.
- Ensure that every child is always within sight and/or sound of an educator, including during toileting, sleep rest and transition routines.
- For all educators to be familiar with regulatory requirements and standards regarding supervision.
- To encourage all educators to evaluate their supervisory practices and implement plans that increase their awareness of layout, risk management and supervisory choices within the centre environment.

IMPLEMENTATION

The Nominated Supervisor will:

- Ensure that the premises are designed and maintained to facilitate supervision of children at all times while considering the need to maintain the rights and dignity of all children.
- Ensure that the age and supervision requirements for educators are maintained at all times. Any educators who are under eighteen years of age may work at the centre-based service, provided they do not work alone and are adequately supervised at all times by an educator who is over eighteen years of age.

- Notify the regulatory authority within 24 hours if a child appears to be missing, cannot be accounted for, appears to have been taken or removed from the premises, or has mistakenly been locked in or out of the education and care services premises.
- Carefully plan rosters that ensure continuity of care and adequate supervision at all times when children are being cared for and educated in the service and on excursions.
- Ensure that a risk assessment is carried out before final authorisation is sought for an excursion. The risk assessment will consider and identify the number of adults required to ensure continuous adequate supervision throughout the excursion.

Educators will:

- Document a supervision plan and strategies for both the indoor and outdoor areas. This will assist educators to position themselves effectively for supervising the children's play. They will take into consideration the layout of the premises and grounds, any higher risk activities, the presence of any animals, the location of activities and the location of the bathroom and nappy change facilities. The supervision plans will be displayed in the outdoor areas to be nearby for all educators.
- Educators are assigned to specific areas. E.g. An educator may be deployed in the grassed area and a further educator on the hard-surface area, as required or, if inside; educators are deployed to eliminate "blind" spots.
- Arrange the education and care environment to maximise the ability of educators to supervise all areas accessible to children. Particular focus will be on gates, the fence line and doors during arrival and departure times.
- Utilise the appropriate play spaces to meet the requirements of health concerns for children. E.g utilise shaded area's for outdoor space. If a play yard has limited outdoor shade, the service is to follow the appropriate risk assessment and strategies to provide children with coverage during play, such as taking the children to another outdoor space to play during times of the day of high UV levels.
- Scan the environment while interacting with individuals or small groups. Educators will position themselves to maximise their view of the environment and the children's play.
- Ensure that supervision arrangements are respectful and that interactions with children are meaningful. Educators will encourage children's independence while respecting individual abilities and needs.
- Be aware of the importance of communicating with each other about their location within the environment.
- Ensure that correct child: educator ratios are maintained throughout the education and care environment. All children will be in sight or hearing of educators at all times. No child will be left alone while eating or at nappy change and toileting times.
- Should an educator member need to leave their area of supervision, a replacement educator must first be in place.
- Inform new and relief educators about supervision arrangements and what is required of them in relation to supervising children.
- Regularly review the supervision plan and strategies to evaluate the effectiveness of the plan and its implementation by educators. The supervision plan and strategies will be displayed for families in all rooms and in the outdoor area.
- Seek to ensure that educators are present/ within view when working with children and when supporting children with toileting/hygiene routines.
- Ensure that hazardous equipment, machinery, and chemicals are inaccessible to children.
- Implement consistent supervision strategies and not perform other duties while responsible for the supervision of children.

- Should any educator breach the requirements of the supervisory policy, he/she may be counselled and/or issued a formal warning. In the case of an incident where an educator is found in breach of the supervision policy, instant dismal may occur.

Educator's Communication:

Educators will work together as a team and foster open and supportive communication whilst caring for children. Educators will:

- Inform each other before they leave an area they are supervising and inform each other when they return
- Seek support and advice from each other when supervising the children
- Remind each other of service practices
- Continuously assess and review care and supervision practices of children to meet each individual child's needs.

Educator Rosters:

The Educator's roster and routines are designed to maximise the consistency of interaction, care and supervision of children by ensuring that:

- Child/Educators ratios are maintained at all times:

State Specific	Educator to Child Ratio: Children over Preschool Age	Educator to Child Ratio: Children over Preschool Age on Excursion	Educator to Child Ratio: Children over Preschool Age walking Excursion	Educator to Child Ratio: Children over Preschool Age – Water Excursion
NSW	1:15	1:10	1:8	1:5

- Educators are available to meet and farewell children and families
- Educator standards are maintained during break times
- Educators will inform their colleagues if and when they leave rooms
- Programs and experiences are well supported by active supervision by ECMS Educators
- Children are well cared and supervised at all times with particular attention to personal care i.e.

- Toileting
- Eating and Drinking
- Rest Periods

Missing Children:

- Regular Head Counts are conducted every 15 minutes at Cubby OOSH by the educators.
- Should a child who is present not be accounted for during the regular checking process, the Centre Supervisor must be informed immediately. The Centre Director initiates a thorough search of the premises while consulting with all educators regarding the whereabouts of the child.
- When the Centre is within the boundaries of another premises (e.g. a school), that area will also be searched.
- If the child has not been located after all areas have been searched and all educators consulted, the Centre Director will contact the child's parents/guardians and the Police.
- Other persons authorised on the child's enrolment form may be contacted to determine further details.
- If the child is located, an educator contacts parents/guardian, any authorised person involved and the Police that the child has been found.
- At all times, educators maintain their duty of care to the remaining children.
- A report is provided to the Regulatory Authority (DEC) within 24 hours

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law Act 2010
  - Section 170 Offence relating to unauthorised persons on education and care service premises
- Education and Care Services National Regulations 2011
  - Regulation 87 Incident, injury, trauma and illness record
  - Regulation 100 Risk assessment must be conducted before excursion
  - Regulation 101 Conduct of risk assessment for excursion
  - Regulation 102 Authorisation for excursions
  - Regulation 115 Premises designed to facilitate supervision
  - Regulation 120 Educators who are under 18 to be supervised
  - Regulation 166 Children not to be alone with visitors
  - Regulation 168 Education and care service must have policies and procedures
  - Regulation 176 Time to notify certain information to Regulatory Authority
- National Quality Standards
  - Standard 2.2 Safety
  - Standard 3.1 Design
  - Standard 4.1 Staffing Arrangements

SOURCES

- The Early Years Learning Framework
- My Time Our Place Framework

- Victorian Early Years Learning and Development Framework
- ACECQA
- United Nations Convention on the Rights of a Child
- ACECQA: Quality Area 2 - Active Supervision: Ensuring Safety and Promoting Learning

2.21 Maintenance of Records Policy

INTRODUCTION

Cubby OOSH is committed to creating, maintaining, storing, accessing and disposing of records in a lawful, accurate, secure and confidential manner. Records may contain personal, sensitive, health, employment, financial and child-safety information and must be protected from loss, misuse, unauthorised access, alteration or disclosure.

PURPOSE

To ensure records required for the operation of Cubby OOSH are complete, accurate, accessible to authorised persons, retained for the correct period and securely destroyed or de-identified when no longer required, in accordance with the National Law and Regulations, Family Assistance Law, workplace laws and applicable privacy obligations.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisors, Responsible Persons, educators, employees, volunteers, students and any person who creates, accesses, stores, transmits or disposes of Cubby OOSH records.

PARAMOUNT CONSIDERATION

Children's safety, rights and best interests are the paramount consideration when records are created, used, disclosed, retained or accessed. Records relating to child safety, incidents, medical needs, allegations, complaints and mandatory reporting must be handled promptly, accurately and confidentially.

RECORD CREATION AND ACCURACY

- Records required under the National Law, National Regulations and other applicable laws will be created at the time required and contain the prescribed information.
- Records must be factual, legible, accurate, objective and sufficiently detailed. Where a correction is required, the original record or audit history must not be improperly concealed or falsified.
- Personal information will be kept reasonably accurate, up to date and complete for the purpose for which it is held. Families and employees will be encouraged to advise the service of relevant changes.
- Only information reasonably necessary for the service's functions, legal obligations, child safety and care will be collected and retained.

AUTHORISED ACCESS AND CONFIDENTIALITY

- Records will only be accessed, used or disclosed by persons who are authorised and require the information for their role, the education and care or medical treatment of a child, a lawful family access request, regulatory or government requirements, or another purpose authorised or required by law.

- Parents may access records relating to their child where permitted by the National Regulations and privacy law. Access will not be provided where disclosure would unlawfully reveal another person's information, create a child-safety risk or where another lawful exception applies.
- Employee records are confidential and may only be accessed by the employee, authorised management/payroll personnel, inspectors or other persons where access is authorised or required by law.
- Information about children, families or employees must not be discussed in public areas, shared through personal messaging accounts, or disclosed to unauthorised persons.
- Subpoenas, warrants, court orders, Regulatory Authority requests, child-protection requests and other compulsory legal demands will be referred to authorised management and responded to in accordance with law.

SECURE STORAGE AND DIGITAL RECORDS

- Records must be stored in a safe and secure place in accordance with Regulation 183. Paper records will be kept in secure areas with controlled access.
- Electronic records will be protected through appropriate access controls such as individual accounts, strong passwords, permissions and secure devices or systems. Access should be limited according to role and business need.
- Service information must only be stored or transmitted through approved systems and devices unless expressly authorised. Personal devices must not be used to retain service records unless an approved process and appropriate security controls are in place.
- Backups, cloud storage and third-party systems must be managed so Cubby OOSH can maintain appropriate control, security, access and retention of the information it holds.
- Lost devices, unauthorised access, accidental disclosure, cyber incidents or suspected privacy/data breaches must be reported immediately to management and managed under applicable privacy and data-breach requirements.

NATIONAL REGULATION RETENTION PERIODS

Records prescribed by Regulation 177 must be retained securely for the relevant period under Regulation 183. Key periods include:

- Incident, injury, trauma and illness records relating to a child: until the child is 25 years of age.
- Records relating to the death of a child while being educated and cared for, or a death that may have occurred as a result of an incident while in care: until the end of 7 years after the death.
- Records relating to an individual child, other than the incident/death records above: until the end of 3 years after the last date the child was educated and cared for by the service.
- Records relating to an educator or other staff member employed, engaged or appointed in relation to the service: until the end of 3 years after the last date the person provided education and care on behalf of the service, unless another law requires a longer period.
- Other prescribed records: until the end of 3 years after the date on which the record was made, unless a longer period applies under another law.
- Where two or more retention requirements apply, Cubby OOSH will retain the record for the longest applicable period.

KEY SERVICE RECORDS

- Enrolment records, authorisations and health information required by Regulations 160-162.
- Attendance records, including arrival and departure information, and records required for Child Care Subsidy purposes.
- Incident, injury, trauma and illness records and any associated first-aid or notification documentation.
- Medication records and medical-condition documentation, including medical management, risk minimisation and communication plans where applicable.
- Educational program and school-age documentation required under the National Regulations, including documentation required by Regulation 74 and NSW school-age care provisions where applicable.
- Responsible Person, staffing, educator, volunteer, student, qualification, training and Working with Children Check records required by law or service procedure.
- Complaints, grievances, child-safety concerns, investigations, notifications and records of the service's compliance with the National Law and Regulations.
- Governance, policies, risk assessments, emergency and evacuation documentation, meeting records and other operational records required by law or service procedure.

CHILD CARE SUBSIDY AND FINANCIAL RECORDS

- Records required under Family Assistance Law for Child Care Subsidy approval will be kept for at least 7 years, stored safely, and changes to those records will be traceable as required.
- Financial, taxation and accounting records will be retained for the period required by applicable Commonwealth and NSW laws and Cubby OOSH financial governance requirements.

EMPLOYMENT AND PAYROLL RECORDS

- Employee time and wages records required by the Fair Work Act and Fair Work Regulations will be kept for 7 years, be legible and readily accessible to a Fair Work Inspector, and will not be altered except to correct an error.
- Other employment records will be retained for the period required by the National Regulations, workplace laws, workers compensation, taxation or other applicable requirements, whichever is longer.

ACCESS, CORRECTION AND RELEASE OF INFORMATION

- Requests by individuals to access or correct their personal information will be managed under applicable privacy law and service procedures.
- Before releasing records, the identity and authority of the requesting person will be verified and information relating to other people will be protected.
- Copies provided to regulators, government agencies, courts or authorised investigators will be recorded where appropriate, including what was provided, to whom and when.

DISPOSAL, DESTRUCTION AND DE-IDENTIFICATION

- Records must not be destroyed while a legal retention period, investigation, complaint, litigation hold, regulatory matter, insurance matter or other lawful requirement remains active.
- When records are no longer required, personal information will be securely destroyed or de-identified where required by applicable privacy law. This includes reasonable consideration of archived copies and backups.
- Paper records will be securely shredded or otherwise destroyed. Electronic records will be securely deleted or placed beyond use where irretrievable deletion is not reasonably possible.

RESPONSIBILITIES

The Approved Provider/Nominated Supervisor will:

- ensure required records are created, maintained, securely stored and retained for the correct period;
- ensure access permissions and approved record systems are appropriate and reviewed;
- ensure educators and staff understand confidentiality, record-keeping and privacy responsibilities;
- respond appropriately to lawful requests, suspected breaches, lost records and unauthorised access; and
- ensure records are not removed, altered, destroyed or disclosed contrary to law or service procedure.

Educators and staff will:

- complete required records accurately and promptly;
- protect passwords, devices, paper files and confidential information;
- only access or share records for authorised work purposes; and
- report errors, missing records, privacy concerns or suspected unauthorised access immediately.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Children (Education and Care Services) National Law (NSW), including section 175 and current child-safety/paramount consideration requirements.
- Education and Care Services National Regulations (NSW), including Regulations 74, 158-162, 168, 177-181 and 183, as applicable.
- A New Tax System (Family Assistance) (Administration) Act 1999 and Family Assistance Law requirements for Child Care Subsidy records.
- Privacy Act 1988 (Cth) and Australian Privacy Principles, where applicable, including APPs 10-13 and APP 11 security/destruction requirements.
- Fair Work Act 2009 (Cth) and Fair Work Regulations 2009 - employee time and wages records.
- National Quality Standard: Quality Area 7 - Governance and Leadership, and other Quality Areas relevant to the record being maintained.

SOURCES

- Australian Children's Education and Care Quality Authority (ACECQA) - Guide to the National Quality Framework and current National Regulations guidance.

- NSW legislation - Education and Care Services National Regulations in force in NSW.
- Australian Government Department of Education - Child Care Subsidy provider record-keeping requirements.
- Office of the Australian Information Commissioner (OAIC) - Australian Privacy Principles Guidelines.
- Fair Work Ombudsman - employee record-keeping requirements.

2.22 Emergency, Evacuation & Lock Down Policy

INTRODUCTION

Cubby OOSH maintains service-specific emergency, evacuation and lockdown procedures so children, educators, staff, volunteers and visitors can respond promptly and safely to emergencies. Procedures are informed by a risk assessment of emergencies relevant to each service, its school-site environment, operating sessions and the children attending.

PURPOSE

- Protect children and others from harm and hazards through planned, practised and effective emergency responses.
- Ensure emergency and evacuation procedures, floor plans, roles, communication methods and assembly/lockdown locations are clear and accessible.
- Ensure all required emergency procedures are rehearsed, documented, reviewed and improved in accordance with the National Regulations.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisor, Responsible Person, educators, staff, volunteers, students, children, families and visitors at Cubby OOSH. It applies during before school care, after school care, vacation care and service activities on the approved premises.

PARAMOUNT CONSIDERATION

Children's safety, rights and best interests are the paramount consideration in emergency planning and response. Procedures will consider each child's age, mobility, communication, disability, medical needs, emotional wellbeing and capacity to understand and follow directions.

DEFINITIONS AND TYPES OF EMERGENCY

Emergency:

A situation or event that poses an imminent or severe risk to people at the service premises and requires an immediate response.

Evacuation:

Moving children and others from an unsafe area to a safer location or assembly point. Examples include internal fire/smoke, gas leak, hazardous chemical spill, structural danger, flood or another hazard where remaining in place is unsafe.

Lockdown / Shelter in Place:

Restricting movement and securing or sheltering people in a safer location when evacuation may increase risk. Examples include a dangerous or aggressive person, police activity, external threat, nearby hazardous release, severe weather or another situation where emergency services advise remaining inside or sheltered.

Other emergencies may include bushfire, medical emergencies, bomb or suspicious-item threats, loss of essential services, severe storms, flooding, earthquake, external fire/smoke, missing child, or other events identified through the service risk assessment. The safest response will depend on the circumstances and advice from emergency services.

EMERGENCY RISK ASSESSMENT AND PLANNING

- The Approved Provider must ensure a risk assessment is conducted to identify potential emergencies relevant to the service and the safe evacuation of all children.

- The Regulation 97 risk assessment will be reviewed at least every 12 months and as soon as practicable after the service becomes aware of circumstances that may affect the safe evacuation of children, including changes to premises, exits, numbers, staffing, children's needs or identified hazards.
- Any necessary changes to emergency and evacuation policies, procedures and floor plans will be made as soon as practicable following review.
- Planning will consider all available evacuation routes and exits, assembly points, lockdown/shelter locations, shared school-site arrangements, access gates, communication systems, emergency equipment, medical needs and children requiring additional assistance.
- The service will consult with the school/site controller and relevant emergency services or suitably qualified experts where appropriate. Shared-workplace emergency arrangements will be coordinated where practicable.
- Emergency procedures and risk controls will be communicated to educators and relevant staff. Children and families may contribute feedback in ways that do not compromise security-sensitive information.

EMERGENCY AND EVACUATION FLOOR PLANS

- A copy of the emergency and evacuation floor plan and instructions will be displayed in a prominent position near each exit at the service premises, including exits forming part of an evacuation route.
- Plans will clearly identify exits, evacuation routes, assembly points and relevant emergency equipment and will reflect the current premises and service arrangements.
- Security-sensitive lockdown details, including any confidential code word or exact protective location information, will be controlled and shared only with people who need the information to safely implement the procedure.

EMERGENCY COMMUNICATION AND EQUIPMENT

- Educators and staff will have ready access to an operating telephone or other similar means of communication while the service is operating.
- Emergency contact numbers, current attendance information and emergency contacts will be readily accessible.
- Emergency bags will be maintained and positioned for rapid access. Contents may include current attendance/contact information, first aid supplies, essential emergency medication, keys/access devices, charged communication equipment and other items identified by the service risk assessment.
- Fire extinguishers, fire blankets and other emergency equipment will be accessible, maintained and tested as required. Staff will only use emergency equipment when trained/competent to do so and when it is safe; evacuation and life safety take priority.

REHEARSALS AND TRAINING

- All emergency and evacuation procedures identified for the service, including evacuation and lockdown where both are part of the emergency plan, will be rehearsed every three months while the service is operating.
- All children, volunteers and staff members present at the service, including the Responsible Person, must participate in the rehearsal at the time it occurs.
- For school-age care, rehearsals will be planned across before school care, after school care and vacation care, at different times/days where practicable, so different children and staff participate and all documented evacuation routes and exits can be practised.
- Each rehearsal will be documented, including the date/time, procedure rehearsed, participants, issues identified, effectiveness of communication/accounting for children, and actions for improvement.
- New, casual and relief educators, students and volunteers will be oriented to emergency procedures, exits, assembly points, lockdown expectations and their responsibilities before or as soon as practicable after commencing at the service.

- Children will be prepared in a calm, age-appropriate and trauma-aware manner. Rehearsals will build confidence without unnecessarily frightening children.

GENERAL EMERGENCY RESPONSE

1. Recognise the emergency, raise the service alarm/alert and immediately protect children from the immediate hazard.
2. Call 000 as soon as required and follow instructions from Police, Fire and Rescue NSW, NSW Rural Fire Service, Ambulance or other emergency authorities.
3. The Responsible Person will initiate the service-specific evacuation, lockdown or shelter-in-place procedure unless immediate action is required before that direction can be given.
4. Educators will maintain active supervision, keep children together, take the safest available route/location and account for every child and adult.
5. Take attendance information, emergency contacts, essential medication and emergency equipment only where this can be done without delaying or endangering the response.
6. Do not re-enter an evacuated area or end a lockdown/shelter response until emergency services or the authorised person coordinating the response advises it is safe.
7. Provide first aid, reassurance and emotional support as needed and arrange family collection or relocation if the premises cannot be safely reoccupied.
8. Document the emergency, complete required incident records and notifications, debrief, review the response and update risk controls/procedures where needed.

EVACUATION PROCEDURE

- Use the safest service-specific evacuation route and assembly point based on the location and nature of the hazard. Do not require children or educators to move toward a hazard merely to follow a preferred route.
- Educators will conduct progressive headcounts and verify children against current attendance records. A final roll/headcount will be completed at the assembly point and any missing person reported immediately to the Responsible Person and emergency services.
- Bathrooms, indoor/outdoor activity areas and other service-use spaces will be checked only where it is safe and doing so does not delay evacuation or expose a person to danger.
- Doors may be closed behind the group where safe. No person is to re-enter a dangerous area to retrieve property, medication or equipment.
- Children requiring mobility, communication, medical, sensory or behavioural support will be assisted in accordance with the emergency risk assessment and individual plans.
- At the assembly point, educators will maintain supervision, provide first aid if required, keep access clear for emergency services and await further instructions.

LOCKDOWN / SHELTER-IN-PLACE PROCEDURE

- Initiate lockdown or shelter in place when remaining in, or moving to, a secured/protected location is assessed to be safer than evacuation, or when directed by Police or another emergency authority.
- Call 000 where there is an immediate threat to safety. Follow emergency-services directions and avoid actions that could escalate a violent or dangerous situation.
- Move children away from the identified threat and to the service's nominated safe area using the safest available route. If moving children would increase danger, educators will use the safest available protective action for their current location.
- Secure doors/windows and reduce visibility/noise where this is appropriate to the threat and can be done safely. Maintain supervision and account for all children and adults.
- Keep communication devices quiet where necessary and avoid non-essential communication that may compromise safety. Family communication will occur when it is safe and appropriate.

- Remain in lockdown/shelter until Police, emergency services or the authorised person coordinating the response gives the all-clear. The all-clear method will be known to staff and will not rely solely on an alarm signal that could be misunderstood.
- After the all-clear, check children's wellbeing, provide reassurance, complete records and review the effectiveness of the response.

BUSHFIRE, SMOKE AND GRASSFIRE

- Services will monitor official NSW Rural Fire Service warnings, Fires Near Me NSW information, Fire Danger Ratings, Total Fire Bans and emergency-services directions where bushfire or grassfire may affect the service.
- The current Australian Fire Danger Rating System uses Moderate, High, Extreme and Catastrophic ratings, with No Rating used on days of minimal risk. The service will not rely on the obsolete Low-Moderate/Very High/Severe categories.
- Fire Danger Rating alone does not determine whether the service evacuates. The service-specific risk assessment, local fire location and direction, smoke/air quality, road/access conditions, school/site arrangements and instructions from emergency services will guide the response.
- On Extreme or Catastrophic fire-danger days, or when a nearby fire presents a credible risk, the Approved Provider/Nominated Supervisor will review service arrangements early, monitor official warnings closely and implement the service's bushfire/emergency plan, including early relocation or closure where required by the risk assessment or authorities.
- Children with asthma or other respiratory/medical needs will be managed in accordance with their current medical management plans, with medication immediately accessible.
- Families will be informed of significant service impacts, relocation, closure or collection arrangements when safe to do so. Emergency-services instructions take priority over routine family communication.

BOMB THREAT OR SUSPICIOUS ITEM

- Treat threats seriously and contact Police on 000 where there is an immediate threat or emergency.
- Do not touch, move or interfere with a suspicious item. Follow Police instructions about evacuation, lockdown, communications and assembly locations.
- If a threat is received by telephone or message, preserve available information and record details when safe to do so. Do not delay immediate protective action to complete paperwork.

SEVERE WEATHER, FLOOD, GAS LEAK OR HAZARDOUS RELEASE

- Follow official warnings and emergency-services directions and use evacuation or shelter in place according to the location and nature of the hazard.
- Do not move children through floodwater, smoke, gas, chemical fumes, fallen powerlines or another unsafe area. If the usual assembly point or route is unsafe, use the documented alternative or follow emergency-services directions.
- Where utilities, buildings or grounds are unsafe, the service may relocate, cease operations or arrange collection in accordance with the emergency plan and Approved Provider direction.

CHILDREN WITH MEDICAL, DISABILITY OR ADDITIONAL NEEDS

- Emergency planning will identify children who may require additional assistance to evacuate, shelter, communicate, regulate or access medication/equipment.
- Individual medical management, risk minimisation and communication plans will be integrated into emergency planning where relevant.
- No child will be left behind or expected to manage an emergency independently because of age, disability, communication difference, behaviour, medical condition or other support need.

FAMILY AND VISITOR RESPONSIBILITIES

- Families must keep emergency contacts, authorised nominee details and relevant medical information current.
- Families and visitors present during an emergency or rehearsal must follow educator/emergency-services directions and must not remove a child without the required attendance/departure process unless emergency circumstances make the normal process impossible.
- Families should not enter an unsafe service area during an active emergency. Collection or reunification arrangements will be communicated when safe and practicable.

POST-INCIDENT ACTIONS AND NOTIFICATIONS

- The Responsible Person will ensure children and adults are accounted for, injuries/illness are managed, families are informed as appropriate, and required incident/illness records are completed.
- The Approved Provider will assess whether the event is a serious incident or another prescribed matter requiring notification to the NSW Regulatory Authority under the National Law and Regulations, and will notify within the applicable timeframe.
- SafeWork NSW and other authorities will be notified where separate workplace or other legal notification requirements apply.
- Following an actual emergency or rehearsal, the service will debrief, identify improvements and update the emergency risk assessment, procedures, floor plans, equipment or training as necessary.

RESPONSIBILITIES

Approved Provider / Nominated Supervisor / Responsible Person:

- Maintain current emergency risk assessments, procedures, floor plans, emergency equipment and communication arrangements.
- Ensure required rehearsals, records, staff induction/training and reviews occur.
- Coordinate with the school/site controller and emergency services where relevant and lead the service response until emergency services take control.

Educators and Staff:

- Know and follow service-specific emergency procedures and participate in rehearsals.
- Maintain active supervision, know current child numbers and locations, account for children, assist children requiring additional support and follow emergency-services directions.
- Report hazards, emergency-plan issues and changes that could affect safe evacuation or lockdown arrangements.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Children (Education and Care Services) National Law (NSW), including section 167 - protection from harm and hazards, applicable incident notification provisions, and the paramount consideration of children's safety, rights and best interests.
- Education and Care Services National Regulations (NSW), including Regulation 97 - emergency and evacuation procedures and risk assessment; Regulation 98 - telephone or other communication equipment; Regulation 99 - children leaving the premises; Regulation 136 - first aid qualifications; Regulations 168, 170 and 171 - required policies and compliance; Regulation 176 - prescribed notifications; and Regulation 183 - storage of records, as applicable.
- Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2025 (NSW), including workplace emergency-plan requirements.
- National Quality Standard: Quality Area 2 - Children's Health and Safety; Quality Area 3 - Physical Environment; and Quality Area 7 - Governance and Leadership.

SOURCES

- Australian Children's Education and Care Quality Authority (ACECQA) - Guide to the National Quality Framework and Emergency and Evacuation Policy Guidelines.
- NSW Rural Fire Service - Fire Danger Ratings, Total Fire Bans, Fires Near Me NSW and bushfire warnings.
- SafeWork NSW - Emergency Plans and workplace emergency guidance.
- Relevant Police, Fire and Rescue NSW, NSW Rural Fire Service, NSW State Emergency Service and Ambulance NSW directions during an emergency.

2.23 Incident, Injury, Trauma and Illness Policy

INTRODUCTION

Cubby OOSH is committed to protecting children from harm and hazards and to responding promptly, respectfully and consistently when a child is injured, becomes ill, is involved in an incident or experiences trauma while attending before school care, after school care, vacation care, an excursion or transportation arranged by the Service.

PURPOSE

This policy sets out the procedures for recognising and responding to incidents, injury, trauma and illness; providing first aid and emergency assistance; notifying families and the Regulatory Authority when required; completing records; and reviewing incidents to reduce the likelihood of recurrence.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisor, Responsible Person, educators, staff, students and volunteers. It should be read with the Administration of First Aid, Medical Conditions, Medication, Child Protection, Hygiene, Infectious Disease, Emergency/Evacuation/Lock Down and Delivery and Collection policies.

PARAMOUNT CONSIDERATION

The safety, rights and best interests of children are the paramount consideration in all decisions and actions under this policy. Children will be treated with dignity, reassured in an age-appropriate way and supported to understand what is happening. Privacy will be protected and information shared only with people who need it for the child's care, safety, legal obligations or incident review.

IDENTIFYING AND RESPONDING TO ILLNESS

Educators do not diagnose illness. They observe each child's usual presentation and respond to symptoms, severity, known medical conditions and the child's ability to participate comfortably and safely. Concerning signs may include unusual behaviour or lethargy, fever, vomiting or diarrhoea, rash, eye or ear discharge, persistent or worsening respiratory symptoms, difficulty breathing, severe pain, reduced fluid intake, fainting, seizure, or any rapid deterioration.

If a child becomes unwell at the Service:

- Assess the child promptly and provide first aid or emergency care within the educator's training. Call 000 immediately for serious symptoms, breathing difficulty, unresponsiveness, a first seizure, severe allergic reaction, significant trauma or where urgent medical assistance is reasonably required.
- Move the child, where appropriate, to a comfortable supervised area away from others while maintaining adequate supervision and the child's dignity.
- Notify the parent/guardian as soon as practicable and request collection when the child is too unwell to participate, presents a possible infection risk, requires medical assessment or needs care that cannot reasonably be provided at OOSH.
- Continue to monitor the child until collected or transferred to a health professional. Do not delay urgent medical treatment while attempting to contact a family.
- Complete the Incident, Injury, Trauma and Illness Record as soon as practicable and within 24 hours, including all information required by Regulation 87.

Fever

A fever is a temperature above 38.0°C. If a child's temperature is 37.5°C–37.9°C, educators should monitor the child and retest within approximately 30 minutes where appropriate. At 38.0°C or above,

the family will be contacted and asked to collect the child. The child may return when their temperature remains normal and they are otherwise well enough to participate, unless a diagnosed condition has a different exclusion requirement. Cubby OOSH does not apply an automatic additional 24-hour fever exclusion where the temperature has returned to normal.

Medication, including paracetamol or ibuprofen, will only be administered in accordance with the Medication Policy and Regulations 92–95. Medication will not be given simply to mask symptoms so that an unwell child can remain at the Service.

Vomiting and diarrhoea

A child who vomits or has diarrhoea at the Service will be collected as soon as practicable. Cubby OOSH applies a minimum 24-hour exclusion from the last episode of vomiting or diarrhoea, provided the child is otherwise well. If norovirus is confirmed, the minimum exclusion is 48 hours after symptoms stop. Any longer exclusion period directed by NSW Health/Public Health Unit or required for a diagnosed condition must be followed.

Where two or more cases of gastroenteritis are linked to the Service, the Nominated Supervisor/Approved Provider will notify the local NSW Public Health Unit as soon as possible on 1300 066 055 and follow its outbreak-management advice. Staff with vomiting or diarrhoea must not handle food until symptom-free for at least 48 hours.

Respiratory symptoms and other infectious symptoms

A runny nose, mild cough or residual cough alone does not automatically require exclusion. A child may need to go home where respiratory symptoms are severe or worsening, multiple new symptoms are present, or symptoms occur with fever, rash, significant tiredness, pain or other concerning signs. Exclusion periods for diagnosed conditions will follow current NHMRC Staying Healthy guidance and NSW Health/Public Health Unit directions.

Medical information or clearance

The Service does not routinely require a medical certificate after ordinary illness. However, the Nominated Supervisor may reasonably request medical advice or written medical information where there are ongoing or repeated symptoms, uncertainty about whether a child can safely participate, a significant infection risk, a medical condition requiring clarification, or Public Health Unit advice. A medical certificate does not override a minimum exclusion period or a NSW Health/Public Health Unit direction.

INCIDENT, INJURY AND FIRST AID RESPONSE

For any incident or injury, educators will first secure the child's immediate safety, maintain supervision of all children and provide first aid within their training. First aid kits and required emergency medication must be readily accessible at the Service and during excursions and transportation.

- For minor injuries, assess and treat the injury, monitor the child and notify the family in accordance with the seriousness and circumstances. Cubby OOSH will telephone families for head injuries and other injuries where prompt family awareness is appropriate.
- For serious injury, illness or trauma, call 000 without delay where urgent medical attention is required or reasonably appears to be required. Continue first aid until emergency services take over.
- If a child is transported by ambulance, provide relevant health information and medication/action plans to emergency personnel where available and lawful. An educator may accompany the child where necessary and practicable while adequate supervision and ratios for the remaining children are maintained.
- Blood and body-fluid exposure will be managed using standard precautions, gloves where exposure is possible, safe cleaning and disposal, and hand hygiene.

- Photos of an injury may be taken only where reasonably necessary for the incident record, investigation or notification process, using an authorised service device/system and in accordance with privacy and digital safety requirements.

PARENT/GUARDIAN NOTIFICATION

The Approved Provider must ensure a parent of a child is notified as soon as practicable, but no later than 24 hours after the occurrence or alleged occurrence of an incident, injury, trauma or illness involving the child while being educated and cared for. Serious matters, head injuries, significant illness and situations requiring medical attention will be communicated promptly rather than waiting until collection.

INCIDENT, INJURY, TRAUMA AND ILLNESS RECORD

A record will be completed as soon as practicable and no later than 24 hours after the incident, injury, trauma or onset of illness. The record will include, as applicable:

- The child's name and age; date and time; circumstances leading to the incident, injury or trauma; and details of the illness and symptoms observed.
- Details of any action taken, first aid or medication administered, and the name of the person who administered it.
- Details of any person who witnessed the incident where required.
- The time and date a parent/guardian was notified, the person notified and the method of notification.
- Details of any medical practitioner, hospital or emergency service contacted or attended.
- Any supporting information reasonably required for a serious-incident review or regulatory notification.

Records will be stored securely and retained in accordance with Regulations 177 and 183 and the Service's Maintenance of Records Policy. Access is limited to authorised persons.

SERIOUS INCIDENTS AND REGULATORY NOTIFICATION

The Approved Provider will assess incidents against the definition of a serious incident in Regulation 12 and the notification requirements under section 174 and Regulations 175–176. Serious incidents include, among other prescribed circumstances:

- The death of a child while being educated and cared for, or following an incident that occurred while the child was being educated and cared for.
- Serious injury or trauma for which a reasonable person would consider urgent attention from a registered medical practitioner was required, or for which the child attended or ought reasonably to have attended a hospital.
- Serious illness for which the child attended or ought reasonably to have attended a hospital.
- An emergency for which emergency services attended, or ought reasonably to have attended, the education and care service premises.
- A child appearing to be missing or unable to be accounted for, being taken or removed in contravention of the Regulations, or being mistakenly locked in or locked out of the premises or any part of the premises.

A death must be notified to the Regulatory Authority as soon as practicable and within 24 hours. Other serious incidents must be notified within 24 hours of the incident or the Approved Provider becoming aware of it. Notifications will be made through the current NQA IT System/ACECQA notification process. Other prescribed complaints or incidents will be notified within the applicable statutory timeframe.

For a potentially notifiable matter, the Nominated Supervisor will preserve relevant evidence and promptly provide the Approved Provider/Area Manager with the incident record and, where relevant,

witness statements, supervision information, risk assessments, first-aid information and other supporting material. Internal review must not delay a statutory notification deadline.

TRAUMA-INFORMED RESPONSE

A child may experience trauma after an accident, medical emergency, frightening event, violence, abuse, loss, natural disaster or other significant event. Responses will be individualised and trauma-informed. Educators will avoid labelling behaviour as "naughty" or deliberately difficult and will consider whether behaviour may be communicating distress.

- Provide calm, predictable care, reassurance, choice and access to a trusted educator or quiet space.
- Listen without pressuring the child to talk or repeatedly recount the event. Use age-appropriate language and allow the child to express feelings through play, drawing, movement or conversation.
- Work with the family and, where appropriate, relevant professionals to support the child's ongoing wellbeing and reasonable adjustments.
- Where trauma raises a child-protection concern, follow the Child Protection Policy and mandatory/reportable conduct obligations immediately.
- Offer debriefing and wellbeing support to educators and children following significant incidents while maintaining confidentiality.

MISSING OR UNACCOUNTED-FOR CHILD

If a child appears missing or cannot be accounted for, educators must treat the matter as urgent. There is no mandatory waiting period before contacting Police.

- Immediately alert the Nominated Supervisor/Responsible Person, check the attendance record and conduct an immediate roll call/head count while maintaining supervision of all other children.
- Initiate a coordinated search of the immediate service/school environment only where this can occur safely and without compromising supervision. Secure exits where appropriate and check likely locations.
- Call Police on 000 without delay where the child is not immediately located, there is an absconding/traffic/water/stranger or other immediate safety risk, or the circumstances otherwise require emergency assistance. Notify the parent/guardian and Approved Provider promptly.
- Follow the Emergency, Evacuation & Lock Down Policy and any school-site emergency arrangements. Preserve relevant CCTV, attendance, gate/access or witness information where available.
- Complete records, witness statements and a post-incident risk/supervision review. The Approved Provider will notify the Regulatory Authority within 24 hours as required for a serious incident.

UNAUTHORISED REMOVAL / CHILD TAKEN FROM THE SERVICE

Educators will follow the Delivery and Collection of Children Policy and any court orders held by the Service. If a person attempts to remove a child without authority, educators will prioritise the safety of all children and staff, seek assistance and contact Police where necessary. Educators are not expected to place themselves or other children at risk through physical confrontation. If a child is taken or removed contrary to the Regulations, the family/authorised contact, Approved Provider and Police will be contacted promptly and the Regulatory Authority notified within 24 hours as required.

CHILD MISTAKENLY LOCKED IN OR LOCKED OUT

Immediately restore the child to a safe supervised area, assess for injury or distress and provide first aid or emergency assistance if needed. Notify the Nominated Supervisor/Responsible Person, family and Approved Provider promptly. Complete the incident record and review access, supervision and transition controls. This is a serious incident requiring notification to the Regulatory Authority within 24 hours.

DEATH OR APPARENT DEATH OF A CHILD

If a child is unresponsive and appears deceased, educators must treat the child as unresponsive and follow current first-aid/CPR directions. Call 000 immediately, continue resuscitation as directed until paramedics or another authorised health professional takes over, maintain supervision of other children and protect the child's dignity and privacy. Educators must not pronounce death.

The Nominated Supervisor/Approved Provider will cooperate with emergency services and Police, contact the family in accordance with emergency-service advice, preserve the scene and relevant records where required, arrange appropriate support/debriefing, and notify the Regulatory Authority as soon as practicable and within 24 hours. No staff member is to make public or social-media statements about the incident unless authorised.

ROLES AND RESPONSIBILITIES

Approved Provider / Nominated Supervisor / Responsible Person

- Ensure this policy is implemented, available and understood by educators, including casual and relief staff.
- Ensure adequate supervision, current first-aid arrangements, accessible first-aid kits and emergency information, and appropriate risk controls.
- Ensure families are notified and records are completed within required timeframes.
- Assess incidents for Regulatory Authority, Public Health Unit, child protection/reportable conduct or other notification obligations and ensure notifications are made on time.
- Review significant or recurring incidents, update risk assessments/supervision arrangements and communicate relevant improvements to staff.

Educators and staff

- Act immediately to protect children, provide care within training and seek emergency assistance when required.
- Maintain supervision of all children during an incident and follow directions of the Responsible Person/emergency services.
- Accurately document observations and actions without speculation, diagnosis or blame.
- Maintain confidentiality and only use authorised service systems/devices for incident information and images.
- Participate in debriefing, risk review and corrective actions.

CONTINUOUS IMPROVEMENT

Incidents, injuries, trauma and illness trends will be reviewed to identify hazards, supervision issues, environmental factors, equipment concerns, behaviour/support needs or procedural gaps. Corrective actions may include changes to supervision plans, risk assessments, environments, training, procedures or family communication. Families will be notified of policy changes in accordance with Regulation 172.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law (NSW): section 2A (paramount consideration); sections 165, 167 and 174.
- Education and Care Services National Regulations (NSW): Regulation 12; Regulations 85, 86, 87, 88, 89, 90–96 as applicable, 97, 99, 103, 136, 161, 162, 168, 170, 171, 172, 175, 176, 177 and 183.
- Public Health Act 2010 (NSW) and Public Health Regulation 2022 (NSW), as applicable to notifiable diseases and outbreaks.
- Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2025 (NSW), as applicable.

- National Quality Standard: Quality Area 2 – Children's Health and Safety; relevant elements of Quality Areas 3 and 7.

SOURCES

- ACECQA – Incident, injury, trauma and illness: Policy and procedure guidelines (March 2026).
- ACECQA – Guide to the National Quality Framework (2026) and notification types/timeframes guidance.
- NSW Legislation – Education and Care Services National Law (NSW) and Education and Care Services National Regulations (NSW), current 2026.
- NHMRC – Staying Healthy: Preventing infectious diseases in early childhood education and care services, 6th Edition (2024).
- NSW Health – Reporting notifiable diseases: schools and child care facilities (current July 2026).
- NSW Health – gastroenteritis outbreak and Public Health Unit guidance.

2.24 Storage, Labelling & Housing of Dangerous Products Policy

INTRODUCTION

Cubby OOSH is committed to protecting children, educators, families and visitors from harm associated with hazardous chemicals, medicines, poisons, sharps, cleaning products and other potentially dangerous products. Controls are based on the National Law duty to take every reasonable precaution, the National Regulations, and current NSW work health and safety requirements.

PURPOSE

To ensure dangerous products are identified, risk assessed, labelled, stored, used and disposed of safely, remain inaccessible to children unless intentionally used in a supervised learning experience, and are managed in accordance with product labels, Safety Data Sheets (SDS) and applicable legislation.

SCOPE

- Applies to all Cubby OOSH services, including before school care, after school care, vacation care, excursions, transport preparation areas and shared school-site spaces used by the service.
- Applies to educators, staff, volunteers, students, contractors and any person who brings, uses or stores potentially dangerous products in an OOSH area.
- Includes hazardous chemicals, cleaning and maintenance products, pesticides, fuels, aerosols, medicines, batteries, sharps, broken glass and other products or equipment that may cause poisoning, burns, cuts, inhalation injury, fire or other harm.

PARAMOUNT CONSIDERATION

The safety, rights and best interests of children are the paramount consideration in decisions about the purchase, storage, use and accessibility of dangerous products. Risks will be eliminated where reasonably practicable and otherwise minimised using effective controls.

PRINCIPLES

- Use the least hazardous product that will effectively perform the task, where reasonably practicable.
- Keep dangerous products in the smallest practical quantities and remove unwanted or expired products promptly.
- Never store chemicals in food or drink containers. Products must remain in original labelled containers wherever practicable.
- Children must not have unsupervised access to chemical stores, cleaning cupboards, medicines, sharps, fuels or other dangerous products.
- Controls must reflect the actual product, quantity, environment and activity rather than relying only on a generic rule.

IMPLEMENTATION

Approved Provider / Nominated Supervisor

- Ensure every reasonable precaution is taken to protect children from harm and hazards and that premises, furniture and equipment are safe, clean and in good repair.
- Identify dangerous products and hazardous chemicals used or stored by the service and assess risks before use, including risks created by shared school facilities or contractor activities.
- For workplace hazardous chemicals, obtain current SDS where required and maintain a hazardous chemical register containing the product list and current SDS, subject to any lawful exemptions such as certain consumer products used in a manner consistent with household use.
- Ensure workers can readily access relevant SDS and are given information, instruction, training and supervision appropriate to the products they use.
- Ensure spill response equipment, first aid arrangements and emergency procedures are appropriate to the hazards present.
- Coordinate with the school or site controller where dangerous products are stored or used in shared areas, and ensure OOSH children cannot access those areas.

STORAGE

- Store chemicals, poisons and dangerous products in secure locations inaccessible to children, preferably locked where the risk warrants it, and in accordance with the manufacturer label and SDS.
- Segregate incompatible chemicals and keep products away from food, food-contact items, medicines and personal items where contamination could occur.
- Store flammable or combustible products in the lowest practical quantity and away from ignition sources, heat and direct sunlight as required by the label/SDS.
- Do not leave cleaning chemicals, aerosols, pest products, whiteboard cleaners, dishwasher products or similar items unattended in children's bathrooms, activity areas, kitchens or outdoor play spaces.
- Refrigerated medicines or products must be stored in accordance with the relevant medical plan/Medication Policy and remain inaccessible to children while allowing timely access in an emergency.

LABELLING AND DECANTING

- Workplace hazardous chemicals must be correctly labelled in accordance with current WHS requirements and the Globally Harmonised System (GHS) where applicable.
- Where a hazardous chemical is transferred or decanted and will not be used immediately, the receiving container must be suitable for the chemical and correctly labelled. Never use drink bottles, food containers or containers that could be mistaken for food or beverages.
- Illegible, missing or damaged labels must be addressed before the product is used. Staff must not guess the identity of an unknown substance.

SAFE USE AND PERSONAL PROTECTIVE EQUIPMENT

- Read and follow the product label and SDS before use. Do not mix chemicals unless the manufacturer specifically directs that they may be mixed.
- Use ventilation, isolation, safer work methods and other higher-order controls before relying on personal protective equipment (PPE).

- Wear gloves, eye protection, protective clothing, respiratory protection or other PPE when required by the risk assessment, label or SDS. PPE is not automatically required for every product.
- Wash hands after handling chemicals and before handling food. Prevent chemical contamination of food, drink, utensils and children's resources.
- Children may participate in age-appropriate supervised experiences involving low-risk materials only after the activity and product have been assessed as safe. Hazardous chemicals are not used as children's play materials.

SPILLS, EXPOSURE AND POISONING

- Remove children and other persons from the affected area and prevent access. Follow the SDS/label for spill containment, ventilation, PPE, first aid and clean-up.
- Do not clean an unknown or high-risk spill unless trained and equipped to do so. Call emergency services on 000 where there is immediate danger, serious exposure, fire, significant fumes or a medical emergency.
- For suspected poisoning or chemical exposure, follow first aid directions and contact the Poisons Information Centre on 13 11 26 for advice. Do not induce vomiting unless specifically instructed by a medical professional or the Poisons Information Centre.
- Record and report child incidents in accordance with the Incident, Injury, Trauma and Illness Policy and notify families and the Regulatory Authority where the National Law/Regulations require it.
- Workplace incidents involving workers will also be managed under Cubby OOSH WHS procedures, including SafeWork NSW notification where the incident is notifiable under WHS law.

SHARPS, NEEDLES, BROKEN GLASS AND OTHER HAZARDOUS WASTE

- Keep children away from any discarded needle, syringe, broken glass or other sharp hazard and maintain supervision of the group.
- Do not recap, bend or deliberately manipulate a needle. Use an approved sharps container or other appropriate puncture-resistant container and follow local sharps disposal arrangements. Staff should only retrieve a discarded sharp if they are trained, can do so safely and have appropriate equipment; otherwise isolate the area and arrange safe removal.
- For a needlestick injury, wash the site with soap and water for at least 30 seconds, cover it with a clean dressing, seek prompt medical assessment, notify management and complete required incident/WHS records. Do not squeeze or rub the injury site.
- Broken glass and other sharp waste must be collected using tools such as tongs, brush and pan or other suitable equipment rather than bare hands, and placed in a puncture-resistant disposal container.

PEST CONTROL AND CONTRACTORS

- Pest control, fumigation, maintenance chemicals, paints and similar contractor products must be planned so children are not exposed. Follow re-entry times, ventilation requirements and other instructions provided by the contractor/product manufacturer.
- Contractors must secure tools, chemicals and work areas. The service will coordinate with the school/site controller where work occurs in shared premises.

ELECTRICAL, BATTERIES AND EQUIPMENT

- Electrical equipment must be maintained in a safe condition and used in accordance with manufacturer instructions and WHS requirements. Test-and-tag arrangements will be based on applicable workplace requirements and risk, not a blanket rule that every electrical item must always be tagged.
- Button/coin batteries, rechargeable batteries, power banks and damaged batteries are treated as potential hazards and stored so children cannot access them. Damaged, swollen, leaking or overheating batteries/equipment are removed from use and managed safely.
- Cords, chargers and equipment are positioned to avoid trip, strangulation, electrical and access hazards.

MEDICATIONS

Medication is managed under the Medical Conditions and Medication Policies. Medicines must be stored as directed, remain inaccessible to children except where an authorised school-age self-administration arrangement applies, and remain readily accessible to educators when required for emergency treatment.

MONITORING AND REVIEW

- Chemical storage areas, labels, containers, SDS and spill arrangements are checked as part of the service's WHS and safety inspection process. The frequency is risk-based; a specific daily or quarterly chemical checklist is an internal service control only where Cubby OOSH adopts one.
- Expired, deteriorated, leaking, unlabelled or unnecessary products are removed from use and disposed of in accordance with manufacturer, council, environmental and WHS requirements.
- Risk controls are reviewed after an incident, spill, exposure, change in product, change in storage arrangements, contractor work or when new information becomes available.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law (NSW) - paramount consideration provisions and section 167 (protection from harm and hazards).
- Education and Care Services National Regulations (NSW) - regulations 85-89 (incident/illness/first aid as applicable), 103 (premises, furniture and equipment safe, clean and in good repair), 168 (required policies and procedures), 170-171 (policies to be followed and kept available), and notification provisions as applicable.
- Work Health and Safety Act 2011 (NSW).
- Work Health and Safety Regulation 2025 (NSW), including hazardous chemical classification, labelling, SDS, registers, storage, handling and risk-control requirements as applicable.
- National Quality Standard - Quality Area 2: Children's Health and Safety and Quality Area 3: Physical Environment.

SOURCES

- ACECQA - National Law, National Regulations and Guide to the National Quality Framework (current 2026 guidance).
- SafeWork NSW - Hazardous chemicals: general requirements, GHS labelling, SDS and current NSW Codes of Practice.
- NSW Health - Community sharps management and needlestick injury guidance.
- Poisons Information Centre - 13 11 26.

2.25 Security Policy

INTRODUCTION

Cubby OOSH is committed to maintaining secure, child-safe premises while ensuring children, families, educators and authorised visitors can access the service appropriately. Security controls must protect children from foreseeable harm, unauthorised access, unauthorised collection, absconding and other physical security risks without creating unnecessary barriers to children's participation, dignity or emergency evacuation.

PURPOSE

To establish practical security arrangements for Cubby OOSH premises, including services operating on school sites, and to ensure access systems, keys, gates, doors, visitors, contractors and closing procedures are managed consistently and safely.

SCOPE

- Applies to the Approved Provider, Nominated Supervisor, Responsible Persons, educators, staff, volunteers, students, contractors, visitors, families and other persons entering areas used by Cubby OOSH.
- Applies during before-school care, after-school care, vacation care and other approved service activities on the premises.
- Works together with the service's Child Protection, Supervision, Delivery and Collection of Children, Emergency/Evacuation/Lockdown, Visitors and WHS procedures.

PARAMOUNT CONSIDERATION AND CHILD-SAFE ENVIRONMENT

The safety, rights and best interests of children are the paramount consideration in decisions under this policy. Physical security arrangements will be risk assessed and managed in a way that supports the NSW Child Safe Standards, including Standard 8: physical and online environments minimise opportunities for abuse or other harm.

ACCESS TO THE SERVICE

- Access to service-controlled keys, swipe cards, codes, biometric systems or other credentials is limited to authorised persons according to their role and operational need.
- A current register of service-issued keys, cards or other access devices will be maintained where applicable. Lost, stolen or unreturned credentials must be reported promptly and cancelled, replaced or otherwise controlled as required.
- Access codes, keys and cards must not be shared with unauthorised persons or children. Families must not allow unknown persons to follow them through secured entry points.
- Where Cubby OOSH operates on a school site, access arrangements will be coordinated with the school or site controller. School-owned keys, gates and security systems remain subject to agreed site arrangements.
- Access permissions must be reviewed when a person changes role, no longer requires access or ceases employment/engagement.

DOORS, GATES AND BOUNDARIES

- Doors, gates, fences and other boundaries used to secure children must be kept in safe working order and monitored as part of routine premises checks.

- Entry and exit points must be managed so children cannot leave the service unsupervised and unauthorised persons cannot freely access children.
- Security measures must not obstruct emergency exits or prevent lawful evacuation. Emergency and evacuation procedures take priority where immediate evacuation is required.
- Any damaged lock, gate, fence, door, alarm or access-control system that creates a child-safety risk must be reported immediately and interim controls implemented until repaired.

VISITORS, CONTRACTORS AND UNAUTHORISED PERSONS

- Visitors and contractors must follow the service's sign-in, identification, supervision and child-safety requirements. They must not be given unsupervised access to children unless legally permitted and appropriately authorised.
- Educators will challenge or seek assistance regarding an unknown or unauthorised person where it is safe to do so. If a person presents a threat, staff will prioritise children's safety and follow lockdown/emergency procedures, including calling 000 where required.
- Children will only leave the premises in accordance with the National Regulations, enrolment authorisations and the service's delivery and collection procedures.

OPENING AND CLOSING SECURITY CHECKS

- At opening, educators will check that the areas to be used are safe and that any evidence of break-in, vandalism, damage, suspicious items or other security concerns is assessed before children access the affected area.
- At closing, designated staff will account for all children and staff, check service-use areas, secure doors/windows/gates and storage areas as required, switch off equipment where appropriate, and activate security systems in accordance with site arrangements.
- No security procedure is to result in a child being mistakenly locked in or locked out of the service or any part of the premises. Final checks must include areas a child could reasonably access or hide in.

BREAK-IN, SECURITY BREACH OR SUSPICIOUS ACTIVITY

- Do not enter or remain in an area if there is a reasonable concern that an intruder may still be present or the area is unsafe. Move children and staff to a safe location and call 000 where there is an immediate threat.
- Notify the Nominated Supervisor/Responsible Person and Approved Provider as soon as practicable. Notify the school/site controller, police or other relevant authority according to the circumstances.
- Preserve the scene where appropriate and avoid unnecessary handling of items that may be evidence.
- After the immediate risk is controlled, document the event, review supervision/security controls and complete any required incident, WHS or Regulatory Authority notification.

PRIVACY AND ACCESS-CONTROL INFORMATION

Access records, codes, biometric information, CCTV footage (where used) and other security information must be handled securely and only for authorised purposes. Any biometric or surveillance technology must be used in accordance with applicable privacy, workplace surveillance and child-safety requirements. Security information about children and families must not be disclosed unnecessarily.

CHILDREN'S VOICE AND SAFETY AWARENESS

Children will receive age-appropriate information about boundaries, safe entry and exit, what to do if they feel unsafe, and who they can speak to. Children should be encouraged to identify areas where

they feel unsafe or where visibility and security could be improved. Security practices must not be used to frighten, shame or unnecessarily restrict children.

RESPONSIBILITIES

- The Approved Provider will ensure reasonable precautions are taken to protect children from harm and hazards and that service security systems and policies are reviewed when risks or circumstances change.
- The Nominated Supervisor/Responsible Person will ensure daily security procedures are implemented, access issues are acted on, staff understand emergency responses and site-specific arrangements are communicated.
- Educators and staff will maintain active supervision, protect access credentials, report faults or breaches promptly and follow service procedures for visitors, collection, emergencies and closing checks.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law (NSW), including the paramount consideration of children's safety, rights and best interests; sections 165-167 relating to supervision, inappropriate discipline/conduct and protection from harm and hazards, as applicable.
- Education and Care Services National Regulations (NSW), including regulations 99 (children leaving the premises), 103 (safe premises, furniture and equipment), 104 (fencing), 168 (required policies and procedures), 170 (policies and procedures to be followed), 171 (policies and procedures to be kept available) and 172 (notification of certain policy/procedure changes), as applicable.
- Children's Guardian Act 2019 (NSW) and NSW Child Safe Standards, particularly Standard 8 - physical and online environments minimise opportunities for abuse or other harm.
- Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2025 (NSW), as applicable.
- Privacy Act 1988 (Cth), Workplace Surveillance Act 2005 (NSW) and other applicable privacy requirements where surveillance, access records or biometric information are used.
- National Quality Standard: Quality Area 2 - Children's Health and Safety; Quality Area 3 - Physical Environment; Quality Area 7 - Governance and Leadership.

SOURCES

- Australian Children's Education and Care Quality Authority (ACECQA) - National Quality Framework and Guide to the NQF.
- NSW Office of the Children's Guardian - Child Safe Standards and guidance for child-safe physical environments.
- NSW legislation - Education and Care Services National Law and National Regulations; Work Health and Safety legislation; applicable privacy and surveillance legislation.

2.26 Water Safety Policy

INTRODUCTION

Children's safety and wellbeing are the paramount consideration when planning, supervising and participating in activities in or around water. Water hazards in OOSH may include water play, pools and aquatic venues, beaches, rivers, lakes, dams, creeks, fountains, water features, buckets and containers, hot water, drinking water, excursions and other environments where children could access water.

PURPOSE

Cubby OOSH will identify and manage water-related hazards, provide adequate supervision, complete appropriate risk assessments and support children to build water-safety awareness while participating in inclusive, age-appropriate experiences.

SCOPE

- Applies to before school care, after school care, vacation care, excursions, transport and all water-based activities provided or arranged by the Service.
- Applies to the Approved Provider, Nominated Supervisor, Responsible Person, educators, staff, volunteers, students, contractors and visitors as relevant.
- Works alongside the Service's supervision, excursion, emergency, first aid, incident and child-safe environment policies and procedures.

IMPLEMENTATION

The Approved Provider, Nominated Supervisor and Responsible Person will:

- ensure every reasonable precaution is taken to protect children from harm and hazards associated with water;
- ensure this Water Safety Policy and procedures are current, accessible and followed by educators and staff;
- identify water hazards at the service and in areas used by children, including hazards on shared school premises;
- ensure hazards that cannot be adequately supervised or made safe are isolated, secured, removed or made inaccessible to children;
- ensure adequate supervision is planned according to the activity, environment, children's ages, abilities, swimming competence, medical needs and foreseeable risks. Minimum ratios alone may not be sufficient for a water activity;
- ensure at least one person who holds the required current approved first aid, anaphylaxis management and emergency asthma management qualifications is in attendance and immediately available, subject to the National Regulations and applicable school-site arrangements;
- ensure emergency procedures, communication methods, first aid equipment and access for emergency services are considered when planning higher-risk water activities.

WATER PLAY AT THE SERVICE

- Water play will be actively supervised. Educators must position themselves so they can see, hear and respond immediately to children and changing risks.
- Water troughs, tubs, buckets and other containers will be filled only to the level required for the activity and emptied promptly after use. Containers capable of holding water will not be left accessible when unsupervised.
- Children will be discouraged from drinking water used for play. Clean drinking water will remain readily available to children throughout the session.
- Water-play equipment will be cleaned and maintained according to the Service's hygiene procedures, the type of equipment, visible contamination and manufacturer instructions. Routine chlorination of small water-play troughs is not required unless specifically indicated by the equipment, activity or public-health advice.
- If water is contaminated by faeces, vomit, blood or another body fluid, children will be removed from the activity and the water and equipment will be managed using current infection-control procedures before reuse.
- Activities involving hoses, sprinklers, slip surfaces or water on hard surfaces will be assessed for slip, trip, collision, temperature and sun-exposure risks.

WATER HAZARDS AND PREMISES

- Daily environment checks will identify temporary water hazards such as pooled rainwater, open drains, buckets, cleaning water, leaking taps or flooded areas and controls will be implemented promptly.
- Permanent or nearby hazards such as pools, dams, creeks, ponds and water features will be considered in the Service supervision plan and risk controls. Barriers, gates and access points must be maintained where required.
- Non-potable water outlets or tanks accessible to children will be clearly identified and managed so children do not use the water for drinking.
- Hot water, urns, kettles and other scald hazards will be inaccessible to children unless their use forms part of a planned, directly supervised experience with documented controls.
- Pet water containers will be positioned and managed so they do not create an unsupervised water hazard or hygiene risk.

EXCURSIONS AND AQUATIC ACTIVITIES

Before an excursion involving or occurring near water, the Service will complete the excursion risk assessment and authorisation requirements under the National Regulations. The assessment will be specific to the venue and activity and will consider:

- proximity and access to water, depth, currents, tides, weather, terrain and environmental conditions;
- children's ages, abilities, swimming competence, medical conditions, additional needs and previous experience;
- adequate supervision, educator positioning, headcounts, designated groups and whether additional educators or a lower educator-to-child ratio are required;
- qualifications or competencies required by the venue/activity, including lifeguard arrangements where applicable;

- personal flotation devices or other safety equipment where required by the activity, venue, risk assessment or applicable rules;
- emergency procedures, rescue arrangements, first aid, communication, meeting points and access for emergency services;
- transport, transitions, toilets/change rooms and other times when supervision may be more difficult.

The former blanket internal ratio of 1 educator to 2 children for every excursion near water is not treated as a universal legal ratio. The Service will determine the level of supervision and any additional staffing required from the specific risk assessment. Where a venue, governing body or activity standard imposes a stricter requirement, that requirement will be followed.

SWIMMING AND WATER ENTRY

- Swimming or intentional entry into water will only occur where it is specifically planned, authorised and covered by a detailed risk assessment.
- Children's swimming ability must not be assumed. Information from families and the child, together with the activity and venue requirements, will inform supervision and safety controls.
- Children must not be permitted to enter water outside the approved activity or designated supervised area.
- Where the Service cannot provide safe and adequate supervision for a proposed swimming or aquatic activity, the activity will not proceed.

SUPERVISION AND CHILDREN'S PARTICIPATION

- Educators will maintain active, diligent supervision and know where children are at all times. Supervision will be increased where the consequences of a lapse could be severe.
- Children will receive clear, age-appropriate safety expectations before and during water activities and will be encouraged to identify hazards and contribute to safe practices.
- Children's dignity, inclusion and agency will be respected. Reasonable adjustments will be made for disability, medical conditions, sensory needs, cultural considerations and differing confidence around water without compromising safety.
- No child will be pressured to enter water or participate in a water activity.

EMERGENCY RESPONSE AND INCIDENTS

- In an emergency, educators will immediately protect children from further danger, commence first aid/CPR within their training, and call 000 where emergency assistance is required.
- Parents/authorised nominees will be notified as soon as practicable and no later than 24 hours where Regulation 86 applies.
- An Incident, Injury, Trauma and Illness Record will be completed in accordance with Regulation 87 and the Service's related policy.
- The Approved Provider will notify the NSW Regulatory Authority within the prescribed timeframe where the incident meets the serious incident or other notification criteria under the National Law and Regulations.
- Following a significant water-safety incident or near miss, the Service will review supervision, risk controls, the relevant risk assessment and this policy/procedure as required.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Children (Education and Care Services) National Law (NSW), including the paramount consideration requirements and sections 165 and 167.
- Education and Care Services National Regulations, including regulations 25 (where applicable), 85-87, 89, 100-102, 136, 168(2)(a)(iii), 170, 171 and 172, as applicable.
- National Quality Standard - Quality Area 2: Children's Health and Safety; Quality Area 3: Physical Environment; and Quality Area 7: Governance and Leadership.
- Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2025 (NSW), as applicable.

SOURCES

- ACECQA - Water Safety Policy and Procedure Guidelines (updated resource, 2026).
- ACECQA - Guide to the National Quality Framework (current 2026 edition).
- NSW Department of Education / NSW Early Learning Commission - Guidance for Outside School Hours Care Services.
- Royal Life Saving Society - Australia - current water safety guidance.
- My Time, Our Place: Framework for School Age Care in Australia V2.0.

2.27 Road Safety Policy

INTRODUCTION

Road and traffic environments are a significant source of risk for school-age children. Cubby OOSH supports children to develop safe, age-appropriate road-user behaviours while ensuring educators actively manage foreseeable risks during arrivals, departures, walking excursions, regular outings and transportation.

PURPOSE

To protect children from harm and hazards associated with roads, vehicles and traffic, and to provide consistent road-safety education and practices across Cubby OOSH services, families, schools and the wider community.

SCOPE

- Applies to children, educators, staff, volunteers, students, families and visitors where road or traffic risks may arise.
- Includes pedestrian safety, car parks and school zones, passenger safety, bicycles and wheeled equipment, excursions, regular outings and transportation.
- Supports children's developing independence while maintaining adequate supervision and age-, ability- and risk-appropriate controls.

PARAMOUNT CONSIDERATION

The safety, rights and best interests of each child are the paramount consideration in decisions made under this policy. Road-safety practices will be inclusive and responsive to children's age, development, disability, mobility, communication, sensory needs and individual circumstances.

IMPLEMENTATION

Management / Nominated Supervisor / Responsible Person will:

- Ensure reasonable precautions are taken to protect children from road, vehicle and traffic hazards and that adequate supervision is maintained.
- Ensure excursions and regular outings are planned, risk assessed and authorised in accordance with Regulations 100–102, including road crossings, walking routes, car parks, transport arrangements and transitions between the service and destination.
- Where the service provides transportation other than as part of an excursion, comply with the safe transportation requirements in Regulations 102B–102F, including risk assessment, written authorisation, attendance records and required embarkation/disembarkation checks.
- Plan the safest practicable walking route and use pedestrian crossings, footpaths and controlled crossings where available. Routes with heavy traffic, poor visibility, roadworks or other significant hazards will be avoided or specifically controlled.
- Ensure children are never left unattended in a vehicle and that vehicle checks and roll/accounting procedures are completed whenever Cubby OOSH transports children.
- Coordinate road-safety arrangements with the school/site controller where the service operates on school premises, including gates, car parks, bus zones and collection areas.

Educators will:

- Actively supervise children near roads, driveways, car parks, vehicle access points and during walking excursions and transport transitions.

- Use age-appropriate road-safety messages such as Look! Listen! Think! before crossing, choosing a safe place to cross, getting in and out of vehicles on the footpath side where practicable, buckling up, and waiting until a bus has moved away before crossing at a safe place.
- Model safe pedestrian behaviour and comply with road rules, pedestrian signals and directions from authorised traffic controllers.
- Position educators strategically when groups cross roads, enter or leave vehicles, or move through busy car parks and school zones. Group size, children's needs, traffic conditions and visibility will inform supervision arrangements.
- Conduct roll calls/headcounts at appropriate transition points and immediately address any discrepancy.
- Encourage children to identify hazards, discuss safe choices and contribute to risk-management strategies without transferring adult responsibility for safety to children.

PASSENGER AND VEHICLE SAFETY

- Every passenger must occupy an appropriate seating position and use a properly adjusted and fastened seatbelt or approved child restraint as required by NSW road rules.
- Children under 7 years must use an approved child restraint suitable for their age and size when travelling in vehicles to which the child-restraint rules apply. Children aged 7 years and over who are too small for an adult seatbelt should continue to use an appropriate booster or restraint; 145 cm is the suggested minimum height for an adult lap-sash seatbelt.
- Child restraints must comply with AS/NZS 1754 and be fitted and used in accordance with manufacturer instructions and NSW requirements.
- Small buses with 12 seats or fewer require use of fitted seatbelts and appropriate child restraints for children under 7. For larger buses, the applicable road rules and the service risk assessment will determine safe arrangements; buses fitted with seatbelts are preferred where practicable.
- Children will remain seated and appropriately restrained while the vehicle is moving and will not distract the driver.
- Loading and unloading will occur at the safest practicable location, away from moving traffic where possible. Children will be accounted for before departure and after disembarkation.

PEDESTRIAN, CAR PARK AND SCHOOL-ZONE SAFETY

- Children will use designated pedestrian paths and crossings where available and will be directly supervised according to the assessed risk.
- Families are encouraged to use safe legal parking, observe school-zone speed limits and signs, avoid double parking or unsafe U-turns, and ensure children enter and exit vehicles from the safer side where practicable.
- Educators will not direct children into traffic or rely solely on children to judge vehicle speed, distance or driver intentions.
- Where a road or car-park environment cannot be safely managed, the activity, route or collection arrangement will be changed.

BICYCLES, SCOOTERS AND WHEELED EQUIPMENT

- Children will wear a correctly fitted approved helmet when riding bicycles or other wheeled equipment where required by law or the activity risk assessment.
- Riding areas will be selected and supervised to minimise interaction with vehicles, pedestrians and fixed hazards. Equipment and surfaces will be checked for obvious hazards before use.

- Road-riding activities will only occur where specifically planned, risk assessed, appropriately supervised and permitted by service procedures.

ROAD-SAFETY EDUCATION AND CHILDREN'S AGENCY

- Road safety will be embedded through planned and spontaneous learning experiences relevant to school-age children rather than relying only on early-childhood messages.
- Children will be supported to recognise changing traffic risks, make safe choices, ask questions and contribute to excursion and transport safety discussions.
- Educators will use current Transport for NSW / NSW Department of Education road-safety resources and reinforce consistent messages with families.

INCIDENTS AND EMERGENCIES

- In a road or transport incident, educators will prioritise immediate safety, call 000 where required, provide first aid within their training, maintain supervision of all children and notify families as required.
- Incident, injury, trauma and illness records and any required Regulatory Authority notifications will be completed in accordance with the National Law, National Regulations and Cubby OOSH policies.
- Following a significant incident, near miss or identified hazard, relevant risk assessments and procedures will be reviewed and controls strengthened where required.

FAMILY RESPONSIBILITIES

- Follow road rules and service/school traffic-management arrangements during arrival and collection.
- Use suitable approved child restraints and seatbelts when transporting children and ensure restraints are correctly fitted and adjusted.
- Provide the service with relevant information about a child's mobility, medical, behavioural or additional needs that may affect safe travel or road access.
- Reinforce safe pedestrian, passenger and wheeled-device behaviours at home and raise any road-safety concern with the service.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law (NSW) – paramount consideration requirements and sections 165 and 167 as applicable.
- Education and Care Services National Regulations – Regulations 99–102, 102B–102F, 168, 170 and 171 as applicable.
- Road Transport Act 2013 (NSW) and Road Rules 2014 (NSW), including child restraint and seatbelt requirements.
- Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2025 (NSW), as applicable.
- National Quality Standard – Quality Area 2 (Children's Health and Safety), Quality Area 3 (Physical Environment) and Quality Area 7 (Governance and Leadership).

SOURCES

- ACECQA – Guide to the National Quality Framework and safe transportation guidance.
- NSW Early Learning Commission / Department of Education – Excursion and transportation regulations; Transporting children safely.
- Transport for NSW / NSW Government – child car seats, seatbelts and current road-safety guidance.
- NSW Department of Education – Key road safety messages K–6 and excursions and road safety.

- My Time, Our Place: Framework for School Age Care in Australia V2.0.

2.28 Animal Policy

INTRODUCTION

Interactions with animals can provide valuable opportunities for school-age children to develop empathy, responsibility, curiosity and understanding of the natural environment. Animal experiences must be planned so that children can participate safely and voluntarily, infection risks are controlled, individual allergies, fears and medical needs are considered, and animal welfare is protected.

PURPOSE

Cubby OOSH supports safe, respectful and humane interactions with animals where these experiences have educational or wellbeing value. The safety, rights and wellbeing of children are the paramount consideration, while the welfare of animals is also protected.

SCOPE

- Provide meaningful, age-appropriate opportunities for children to observe, interact with and learn about animals.
- Identify and manage risks including bites, scratches, allergies, zoonotic infection, animal waste, escape, phobias and animal behaviour.
- Maintain effective supervision, hygiene, handwashing, cleaning and animal-welfare practices.
- Consult children and families and respect a child's choice not to participate in direct animal contact.

IMPLEMENTATION

Risk assessment and approval

- Before a service pet is introduced or an animal visit occurs, the Nominated Supervisor/Responsible Person will consider the educational benefit and complete or review the Cubby OOSH Pet Risk Assessment. The assessment will consider the species and temperament of the animal, the planned interaction, children's ages and abilities, allergies or medical conditions, phobias, hygiene, supervision, enclosure/security, emergency response and animal welfare.
- Management approval will be obtained for service pets and planned animal visits. Where an external animal provider attends, appropriate insurance, qualifications/licences where relevant, safe operating information and provider risk controls will be checked before the activity.
- Families will be informed when appropriate and relevant medical/allergy information will be checked. Children's views, comfort and preferences will be considered. No child will be required to touch, hold or feed an animal.

Animal suitability and welfare

- Animals must be suitable for the service environment and the planned interaction. Animals showing illness, distress, aggression or unpredictable behaviour will not be used for child interaction and veterinary advice will be sought where required.
- Service animals will receive species-appropriate food, clean water, housing, exercise, veterinary care, parasite control and cleaning. Care arrangements must cover weekends, holidays and service closure periods. Treatment of animals must be humane and consistent with applicable NSW animal-welfare and licensing requirements.

- Wild, venomous, poisonous, aggressive or otherwise high-risk animals will not be handled by children unless the activity is delivered by an appropriately qualified/licensed provider and the risk assessment demonstrates that the interaction can occur safely.

Supervision and child interactions

- Educators will actively supervise all child-animal interactions and position themselves so they can intervene promptly. Supervision arrangements will reflect the animal, environment, group size, children's skills and the activity.
- Children will be supported to approach animals calmly, follow the handler's instructions, avoid teasing, chasing or disturbing animals while eating or resting, and recognise signs that an animal needs space.
- Children will be encouraged to contribute to safe rules and animal-care routines where appropriate, while educators remain responsible for tasks that present health or safety risks.

Hygiene and infection prevention

- Children and adults must perform hand hygiene after touching or feeding animals and after contact with cages, tanks, bedding, equipment or animal waste, and before eating or handling food. Soap and water is preferred where hands are visibly dirty; hand sanitiser may be used when soap and water are not available.
- Animals must be kept away from food preparation, food storage and eating areas. Animal food, utensils and cleaning equipment must be stored separately from items used for people.
- Animal faeces, urine, vomit, bedding and other waste will be cleaned promptly by an adult using appropriate PPE and infection-control practices. Children will not clean animal waste. Contaminated areas and equipment will be cleaned and disinfected as appropriate.
- Sandpits and similar play areas will be protected from animal contamination where practicable. If contamination occurs, the affected material will be removed and the area managed in accordance with service hygiene and sandpit procedures.

Bites, scratches and other incidents

- Any bite, scratch, sting or other injury will be managed immediately in accordance with the Administration of First Aid and Incident, Injury, Trauma and Illness policies. The wound will be washed with soap and running water, first aid provided, and medical advice sought where indicated.
- Families will be notified in accordance with Regulation 86 and the incident will be recorded where required by Regulation 87. Serious incidents will be notified to the Regulatory Authority within the required timeframe.
- Following an incident or near miss, the animal interaction and risk assessment will be reviewed before further child contact occurs.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law (NSW)
  - Section 2A - best interests, safety, rights and wellbeing of children are the paramount consideration
  - Section 165 - offence to inadequately supervise children
  - Section 167 - protection of children from harm and hazards
- Education and Care Services National Regulations (NSW)
  - Regulations 77-78 - health, hygiene and safe food practices
  - Regulations 85-87 - incident, injury, trauma and illness procedures, notification and records

- Regulation 103 - premises, furniture and equipment to be safe, clean and in good repair
- Regulation 168 - required policies and procedures

- National Quality Standard - Quality Area 2: Children's health and safety; Quality Area 3: Physical environment, including Element 3.2.3 environmentally responsible practice
- Relevant NSW animal welfare, public health, biosecurity and animal-licensing requirements, where applicable

SOURCES

- ACECQA - QA3 Keeping pets and animals in education and care services (updated 2026)
- NHMRC - Staying healthy: Preventing infectious diseases in early childhood education and care services, 6th Edition (2024)
- Education and Care Services National Law and National Regulations as applying in NSW

2.29 Screen, Media & Digital Technology Policy

INTRODUCTION

Cubby OOSH is a school-age leisure-based service. Digital technology and screen media can support learning, creativity, communication, relaxation and recreation when used safely, purposefully and as one part of a balanced program. Children also have a right to leisure, choice, participation and age-appropriate access to information and entertainment.

Screen use at Cubby OOSH is not limited to formal educational content. As part of our leisure-based program, children may request and choose to watch age-appropriate movies, television programs or shows. These experiences may be offered for enjoyment, relaxation, social connection, special events, wet-weather or quieter periods, while other play and activity choices remain available where practicable.

PURPOSE

To provide a balanced, child-centred approach to screens, media and digital technology that supports children's safety, rights, wellbeing, learning, leisure and agency while meeting current National Quality Framework requirements for the safe use of digital technologies and online environments.

SCOPE

- Provide children with safe and age-appropriate opportunities to use digital technology for learning, creativity, communication, recreation and leisure.
- Recognise children's requests and choices, including requests to watch movies and shows, as part of a responsive school-age leisure-based program.
- Balance sedentary screen-based experiences with active play, social interaction, outdoor experiences, creative opportunities and rest.
- Protect children from inappropriate content, unsafe online interactions, privacy risks and unauthorised capture, storage or sharing of images and information.
- Support inclusive access to technology, including reasonable adjustments and assistive technology where required.

IMPLEMENTATION

- Children will be consulted about screen-based experiences and may request movies, television programs, shows, games, music, creative applications and other digital experiences. Educators will consider children's age, interests, developmental needs, family context, classification/content and the overall balance of the program.
- Movies and shows may be intentionally included as a leisure choice. They do not need to have a formal educational purpose on every occasion. Educators will ensure viewing remains age-appropriate, supervised and consistent with the service program and children's wellbeing.
- Children will not be required to participate in screen viewing. Where practicable, alternative activities will be available for children who do not wish to watch or whose family has communicated a relevant restriction.
- Programs will avoid prolonged or excessive sedentary screen use. For children and young people aged 5-17 years, educators will have regard to the Australian 24-Hour Movement Guidelines, which recommend limiting sedentary recreational screen time to no more than two hours across the whole day and breaking

up long periods of sitting. The service recognises that children's total daily screen use also occurs outside OOSH and will focus on balance rather than applying an inflexible service-only time limit.

- Screen time will not routinely be used as a reward, punishment or substitute for responsive behaviour guidance. Screens may, however, form part of an individual regulation, inclusion or support strategy where this is appropriate to the child and consistent with their support arrangements.
- Children who use digital technology or assistive devices for disability, communication, regulation or additional needs will not be subject to arbitrary screen-time limits that interfere with reasonable adjustments or professional/family guidance.
- Content will be previewed or reasonably assessed for suitability. Educators will consider Australian classification information, themes, language, violence, sexual content, advertising and the maturity of the children present. Streaming services and online platforms will be accessed through service-approved accounts and settings.
- Autoplay, unrestricted browsing, live chat, direct messaging, location sharing, in-app purchases and other unnecessary online functions will be disabled or restricted where reasonably practicable. Children will be actively supervised when accessing online environments.
- Educators will support digital citizenship and online safety, including respectful communication, privacy, consent, recognising unsafe or inappropriate content, seeking help, and not sharing personal information.
- From 27 February 2026, staff working directly with children must not use or have personal digital devices contrary to the National Law and Regulations. Only service-supplied or otherwise lawfully authorised devices may be used for service purposes, including the capture, storage or transmission of images of children.
- Images, video and personal information relating to children will only be captured, accessed, stored, transmitted or published in accordance with service authorisations, privacy requirements, the National Law and Regulations and Cubby OOSH policies. Children's dignity and views about being photographed or recorded will be respected.
- Personal accounts, personal cloud storage, personal email, personal social media and unauthorised applications must not be used to store or transmit service information or images of children.
- Where inappropriate or harmful online content is encountered, educators will stop or restrict access, support affected children, preserve relevant information where appropriate, notify the Nominated Supervisor/Responsible Person and follow incident, child protection and reporting procedures where required.
- Families will be informed about the service's approach to screen media and digital technology and may discuss individual needs or concerns with the service. Educators will communicate significant or ongoing screen-based program practices transparently.
- The Approved Provider and Nominated Supervisor will periodically review digital technology and online-environment risks, supervision arrangements, service-supplied devices, access controls and staff practices.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law Act 2010 - including the paramount consideration of children's safety, rights and best interests, protection from harm and current digital-device requirements.

- Education and Care Services National Regulations - including Regulation 168(2)(ha) safe use of digital technologies and online environments, and related policy, supervision, governance and notification requirements.
- National Quality Standard - Quality Area 1 Educational program and practice; Quality Area 2 Children's health and safety; Quality Area 5 Relationships with children; Quality Area 7 Governance and leadership.
- My Time, Our Place: Framework for School Age Care in Australia V2.0.
- NSW Child Safe Standards and applicable privacy requirements.

SOURCES

- ACECQA - Safe use of digital technologies and online environments; Using digital devices in centre-based education and care services (2026).
- Australian Government Department of Health, Disability and Ageing - 24-Hour Movement Guidelines for Children and Young People aged 5-17 years.
- eSafety Commissioner - online safety guidance and resources for children, families and educators.
- Australian Classification - classification information for films, television and games.

2.30 COVID-19 Health and Safety Policy and Procedure

INTRODUCTION

COVID-19 is now managed as an ongoing infectious respiratory disease and workplace health hazard rather than through the emergency pandemic controls used in 2020–2022. Cubby OOSH applies proportionate, evidence-based infection prevention measures that protect children, families, educators and visitors while supporting children's participation, wellbeing and access to education and care.

PURPOSE

To outline how Cubby OOSH prevents and responds to COVID-19 in NSW OOSH services using current public health advice, the National Quality Framework, work health and safety duties and the service's broader infectious disease procedures.

SCOPE

This policy applies to children, educators, staff, volunteers, students, families, visitors and contractors across before school care, after school care, vacation care, excursions, transport and shared school-site environments. COVID-19 is managed alongside other respiratory infections such as influenza and RSV, with additional controls introduced when risk or public health advice requires them.

PARAMOUNT CONSIDERATION

The safety, rights and best interests of children are the paramount consideration in all decisions under this policy. Controls will be reasonable, non-stigmatising and responsive to individual health, disability, cultural and participation needs.

PREVENTION AND EVERYDAY PRACTICE

Promote regular handwashing, respiratory etiquette and good hygiene practices consistent with the Hygiene and Hand Washing Policies.

Maintain routine cleaning of frequently touched surfaces and clean visibly soiled areas promptly. Enhanced cleaning may be introduced during an outbreak or where advised by public health authorities.

Use outdoor spaces and natural or mechanical ventilation where practicable and appropriate to the service environment.

Encourage children and adults who are unwell to stay home and seek health advice where symptoms are significant, worsening or concerning.

Ensure drinking water, food service and shared resources are managed hygienically. Children are not automatically prevented from self-service food solely because of COVID-19; food safety and hygiene controls apply.

Do not routinely conduct temperature screening, restrict families to foyers, impose fixed physical-distancing rules, segregate rooms, or require one family member for collection unless current public health advice or a service-specific risk assessment requires such controls.

Vaccination is encouraged in accordance with Australian health advice but is not treated by this policy as a general condition of attendance or employment unless a lawful direction or specific requirement applies.

ILLNESS AT THE SERVICE

If a child becomes unwell, educators will assess the child, provide appropriate care, maintain supervision and contact the family for collection where the child is not well enough to participate comfortably or safely.

If a child or adult has severe symptoms such as significant breathing difficulty, collapse, altered consciousness or another medical emergency, call 000 and provide first aid.

Where practicable, a symptomatic child awaiting collection will be supported in a comfortable area away from close contact with others without isolating the child in a way that compromises supervision, dignity or emotional wellbeing.

Families may be asked to seek medical advice where symptoms are severe, persistent, recurrent or where the service needs information to safely support the child. A routine medical clearance is not automatically required after COVID-19.

Incidents, illness and first aid will be documented and families notified in accordance with the Incident, Injury, Trauma and Illness Policy and the National Regulations.

COVID-19 TESTING, ATTENDANCE AND RETURN

Cubby OOSH will follow current NSW Health advice rather than historical mandatory isolation, border, travel or close-contact rules.

A positive COVID-19 test does not create a separate service rule that overrides current NSW Health advice. A person who is unwell should remain away from the service until they are well enough to return and any applicable public health direction has been met.

Children with mild residual symptoms may attend when otherwise well enough to participate, subject to the service's Immunisation, Exclusion and Notifiable Disease Policy and any current NSW Health advice.

The service will not require routine COVID-19 testing unless a lawful public health direction or specific risk-management circumstance requires it.

CONFIRMED CASES AND OUTBREAKS

A single confirmed case will be managed using routine infection-control measures and current NSW Health advice. Automatic service closure, external deep cleaning or notification of every individual case to the Public Health Unit or Regulatory Authority is not required unless a current legal or public health requirement applies.

If multiple linked respiratory illness cases occur, the Nominated Supervisor/Responsible Person will review the pattern, strengthen reasonable controls and seek advice where needed.

NSW Health encourages schools and child care services to contact their local Public Health Unit for guidance if an outbreak of an infectious disease such as COVID-19, influenza or RSV is suspected. The NSW Public Health Unit contact number is 1300 066 055.

Families will be informed of relevant exposure or outbreak information where this is necessary for health and safety, while protecting the privacy and identity of affected individuals.

Any temporary closure will be based on safety, staffing, public health advice or direction and will be notified to the Regulatory Authority where required.

WORK HEALTH AND SAFETY

COVID-19 is managed as a workplace health hazard under the Work Health and Safety Act 2011 and Work Health and Safety Regulation 2025. Controls will be proportionate to the current risk and implemented so far as is reasonably practicable.

Workers are encouraged to report illness and exposure concerns promptly. Additional controls may include improved ventilation, distancing where practicable, masks or other measures when indicated by risk assessment or health advice.

SafeWork NSW notification is required where a worker or other person contracts or is likely to have contracted COVID-19 at the workplace and the event results in notifiable circumstances such as in-patient hospitalisation or death, in accordance with current WHS requirements.

RECORDS, PRIVACY AND COMMUNICATION

Health information, test results and medical information will only be collected where reasonably necessary and will be stored and shared in accordance with privacy, confidentiality and record-keeping requirements.

Communication will be factual, respectful and avoid identifying a child, family or worker unless disclosure is authorised or legally required.

The service will review this policy when public health advice or legislative requirements materially change.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

Children (Education and Care Services) National Law (NSW) – including section 2A paramount consideration and section 174 notification obligations.

Education and Care Services National Regulations (NSW) 2025 – including Regulations 77, 85–88, 103, 168, 170–172, 175–177 and other applicable provisions.

Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2025 (NSW).

Public Health Act 2010 (NSW) and current NSW Health directions/advice.

National Quality Standard – Quality Area 2: Children's Health and Safety and Quality Area 7: Governance and Leadership.

SOURCES AND FURTHER INFORMATION

ACECQA – Dealing with infectious diseases policy and procedure guidelines (March 2026).

ACECQA – Guide to the National Quality Framework (current 2026 edition).

NSW Health – COVID-19 and infectious disease guidance; Reporting notifiable diseases – schools and child care facilities.

SafeWork NSW – COVID-19 (Coronavirus): managing COVID-19 as a workplace health hazard.

NHMRC – Staying Healthy: Preventing infectious diseases in early childhood education and care services, 6th edition.

2.31 Transportation Policy

INTRODUCTION

Cubby OOSH recognises that transportation is part of the education and care service when children are transported by the service or when transport is arranged by the service. School-age transportation can involve additional risks during collection from school, movement between meeting points and vehicles, embarking and disembarking, road travel and arrival at the service or excursion destination. Children's safety, rights and wellbeing are the paramount consideration in all transportation decisions.

PURPOSE

To ensure children are transported safely, accounted for at every transition point and actively supervised in accordance with the Education and Care Services National Law and Regulations, NSW road rules and Cubby OOSH procedures. This policy applies to regular transportation, single transport trips and transportation that forms part of an excursion.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisors, Responsible Persons, educators, employees, volunteers, contractors, drivers, children and families involved in transportation arranged or provided by Cubby OOSH. Transportation may include walking, service vehicles/vans and chartered buses. Cubby OOSH does not routinely use public transport for children unless specifically approved and risk assessed.

DEFINITIONS

- Regular transportation means transportation by or arranged by the service, other than as part of an excursion, where the circumstances relevant to the risk assessment are substantially the same on each occasion.
- Regular outing means a walk, drive or trip to and from a destination visited regularly as part of the program where the relevant circumstances are substantially the same.
- Transportation is considered part of the service from the point at which Cubby OOSH assumes responsibility for the child until responsibility is transferred to an authorised person, school or other agreed destination in accordance with service procedures.

PARAMOUNT CONSIDERATION

In implementing this policy, the safety, rights and best interests of children are the paramount consideration. Risk controls must support active supervision, accurate accounting for every child, safe arrival and departure, children's dignity and age-appropriate participation in road and transport safety.

RISK ASSESSMENT AND AUTHORISATION

- A transportation risk assessment must be completed before the service transports a child. For regular transportation, the assessment must be reviewed at least every 12 months and whenever circumstances change in a way that may affect risk.
- Risk assessments must consider the route and duration; pick-up and destination points; traffic, parking and road-crossing risks; embarking and disembarking; the means of transport; seatbelt/restraint requirements; anticipated numbers of children and adults; supervision; medical needs; communication; weather; emergency procedures; and how each child will be accounted for.
- Written authorisation must be obtained from a parent or other person authorised in the child's enrolment record. Regular transportation authorisation may cover a period of up to 12 months where circumstances remain substantially the same.
- Authorisations must include the information required by Regulation 102D, including the reason, timing/date, pick-up location and destination, means and anticipated duration of transport, anticipated

numbers of children and supervising adults, restraint requirements, and confirmation that the risk assessment and transport policy are available.

ROUTE-SPECIFIC PROCEDURES AND STAFF INDUCTION

- Each regular transport route will have a clear procedure covering meeting points, rolls/head counts, staff responsibilities, required equipment, school handover arrangements, absent or missing children, emergencies and final vehicle checks.
- Educators conducting transport must be inducted into the route, risk assessment and procedure and demonstrate competency before being assigned responsibility.
- Drivers must hold the appropriate current licence and be fit to drive. Service records will be maintained in accordance with Cubby OOSH employment and privacy procedures.
- Any casual or changed booking must be accurately reflected on the transport roll and clearly communicated to the transport team before the run begins.

ACCOUNTING FOR CHILDREN - REGULAR TRANSPORTATION

- For centre-based regular transportation, a Nominated Supervisor or staff member other than the driver must be present at the service premises when children embark or disembark and must account for each child in accordance with Regulations 102E and 102F.
- A record must be made showing how each child was accounted for when embarking and disembarking at the service premises, including the required time and person completing the record.
- After all children have disembarked at the service premises, the required person must physically check the interior of the vehicle to ensure no child remains. The check must include all seating rows, footwells and other areas where a child could remain or be obscured.
- Cubby OOSH applies the same high standard of roll checking, head counts and vehicle checks to other transportation where practicable, including excursions and single trips.
- Children must never be left alone or unsupervised in a vehicle.

SAFE ARRIVAL, SCHOOL COLLECTION AND MISSING CHILD RESPONSE

- School collection arrangements must clearly identify the agreed meeting point and the process for confirming children expected to travel. Educators must use the current transport roll and reconcile changes before departure.
- If a child expected at a collection point is not present, educators must immediately follow the service Safe Arrival/Missing Child procedure: check the roll and booking information, contact the school/service and family as appropriate, maintain supervision of all other children and escalate without delay.
- There is no mandatory waiting period before contacting Police. If a child cannot be promptly located or there is an immediate safety concern, call 000 without delay and notify the Nominated Supervisor/Responsible Person.
- A transport run must not depart until all children expected to be in the service's care are accounted for in accordance with the route procedure.

SUPERVISION AND STAFFING

- Adequate supervision is determined through the risk assessment. The driver's primary responsibility is safe operation of the vehicle and must not be relied upon as the sole means of supervising children where this would not provide adequate supervision.
- Additional educators/adults will be provided where required by the risk assessment, considering children's ages, behaviours, additional needs, medical conditions, vehicle type, route, duration and transition risks.
- Educators will position themselves to maintain effective supervision when children enter/exit vehicles, cross roads, move through car parks or crowds and transition between school, vehicle and service premises.

VEHICLE AND PASSENGER SAFETY

- Vehicles used by the service must be registered, appropriately insured, roadworthy, clean and suitable for the number and needs of passengers.
- Every child must use an approved seatbelt or child restraint required by NSW law. Restraints must be correctly fitted, adjusted and used in accordance with manufacturer instructions and applicable Australian Standards.
- Children under 7 years must use an approved child restraint or booster appropriate to their age/size as required by NSW law. A child aged 4 to under 7 must not travel in the front row of a vehicle with two or more rows unless the permitted NSW exception applies. Rear seating is preferred for children wherever practicable.
- Children will enter and exit on the kerb/footpath side wherever practicable. Vehicles should be parked to minimise road crossings and reversing risks.
- Seatbelts remain fastened until an educator advises it is safe to unbuckle. Bags and loose items must be stored so they do not create trip, obstruction or projectile hazards.
- Food is generally avoided while vehicles are moving because of choking and supervision risks, except where required for a child's medical needs or where a risk assessment supports safe use on a longer journey. Drinking water remains accessible as appropriate.

DRIVER SAFETY

- Drivers must comply with NSW road rules and must not drive if affected by alcohol, illicit drugs, fatigue, illness or medication that may impair safe driving.
- Drivers must not use a hand-held mobile phone while driving. Service communication must occur only when the vehicle is safely parked unless lawful hands-free use is necessary and does not compromise safe driving or confidentiality.
- Smoking and vaping are prohibited in service vehicles and while transporting children.
- Traffic and parking infringements arising from a driver's conduct are the responsibility of the driver, subject to applicable employment arrangements.

EQUIPMENT, MEDICAL NEEDS AND EMERGENCIES

- A suitable first aid kit and children's required emergency medication/medical management items must be readily accessible during transportation. At least one person with the qualifications required by Regulation 136 must be immediately available as required by the Regulations.
- Transport staff must have access to emergency contacts, relevant medical information, a charged service communication device and any other items identified in the risk assessment.
- In a collision, breakdown, injury or other emergency, educators will first secure the safety of children, call 000 where required, administer first aid within their training, account for every child and notify the Nominated Supervisor/Responsible Person and families as soon as practicable.
- Incidents must be recorded and notified in accordance with the Incident, Injury, Trauma and Illness Policy and statutory notification requirements. Internal reporting must not delay emergency action or required notification to the Regulatory Authority.

CHARTERED BUSES AND EXTERNAL TRANSPORT PROVIDERS

- Where a chartered bus or external transport provider is used, Cubby OOSH will take reasonable steps to confirm the provider and vehicle are appropriately licensed/registered and suitable for the proposed transport.
- Educators remain responsible for children's supervision, roll checks and service procedures even where an external driver/provider is used.
- Seatbelts/restraints must be used where fitted and required by law. Children's bags and equipment must be stored safely and aisles/exits kept clear.

ROAD SAFETY AND CHILDREN'S PARTICIPATION

- Road and transport safety will be embedded in the leisure-based program through conversations, real-life practice and child-led learning, including pedestrian safety, passenger safety, safe play and safe use of bikes, scooters and skateboards.
- Children will be supported to understand why rolls, seatbelts, meeting points and safe-door procedures are important. Expectations will reflect each child's age, development, ability and individual needs rather than applying unnecessary restrictions to all school-age children.
- Children's views about transport safety, comfort and routines will be considered when reviewing procedures and risk assessments.

FAMILY RESPONSIBILITIES

- Families must provide accurate booking and transport information and advise the service as soon as possible if a child will be absent or transport arrangements change.
- Families are responsible for children before responsibility is transferred to Cubby OOSH and after collection, including safe supervision in car parks and compliance with NSW child restraint laws in private vehicles.
- If a child is attending a school excursion or other activity that changes the usual collection arrangement, the family must ensure Cubby OOSH is informed and an alternative safe arrangement is made.

NOTIFICATION OF REGULAR TRANSPORTATION

- The Approved Provider will notify the Regulatory Authority when the service starts or stops providing or arranging regular transportation within the timeframe required by the National Regulations and will keep service approval information current.

ROLES AND RESPONSIBILITIES

- Approved Provider: ensure compliant policies, risk assessments, notifications, resources, vehicles/providers and governance systems are in place.
- Nominated Supervisor/Responsible Person: implement route procedures, authorisations, staff induction, daily communication, supervision and record keeping.
- Educators/drivers: follow the risk assessment and route procedure, maintain active supervision, complete all required checks/records and immediately report hazards, incidents or changes.
- Families: provide current authorisations, bookings and absence/collection information.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law (NSW) - paramount consideration and sections 165, 167 and 174 as applicable.
- Education and Care Services National Regulations - regulations 4, 99, 100-102, 102B-102F, 136, 158-161, 168, 170-172, 175, 176, 177 and 183 as applicable.
- Road Transport Act 2013 (NSW) and Road Rules 2014 (NSW), including child restraint and seatbelt requirements.
- Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2025 (NSW).
- National Quality Standard - Quality Area 2, particularly Element 2.2.1 Supervision and Element 2.2.2 Incident and emergency management; Quality Area 6 and Quality Area 7 as applicable.

SOURCES

- ACECQA - Policy and procedure guideline: Safe transportation of children (2026).
- ACECQA - Safe transportation of children; Guidance for adequate supervision during transportation; Active supervision guidance.
- ACECQA - Guide to the National Quality Framework (2026).
- Transport for NSW - child restraint and road safety guidance.
- My Time, Our Place: Framework for School Age Care in Australia V2.0.

ATTACHMENTS / LINKED RISK ASSESSMENTS

- Transport for NSW Driver Consent Form - Driver Licence and Demerit Point Check (where used).
- Transport roll / embarking and disembarking record and vehicle check record.
- Route-specific Transport Risk Assessment and Procedure.
- Excursion Risk Assessment / On-the-Day Excursion Checklist where applicable.

2.32 Online Safety within the service (Online Environment)

INTRODUCTION

Cubby OOSH recognises that digital technologies and online environments are part of children's everyday lives and can support communication, creativity, leisure, learning and social connection. The Service is committed to providing online experiences that are safe, age-appropriate, inclusive and consistent with children's rights, privacy, dignity and wellbeing.

Online safety is approached positively and proportionately. Risks are identified and managed without unnecessarily preventing children from accessing appropriate information, digital play, entertainment, learning opportunities or healthy social connections.

PURPOSE

To provide a child-safe online environment and clear expectations for children, educators, staff, volunteers, families and visitors. This policy supports safe use of digital technologies, appropriate supervision, privacy and image protections, cyber safety education, incident response and compliance with current National Quality Framework requirements.

SCOPE

This policy applies to online environments, internet-connected devices, service-supplied digital devices, apps, games, streaming services, websites, communication platforms, images and recordings used in connection with Cubby OOSH. It applies during before and after school care, vacation care, excursions, transportation and other activities conducted by the Service.

PARAMOUNT CONSIDERATION

The safety, rights and best interests of children are the paramount consideration in decisions about digital technologies and online environments. Children's views, age, maturity, individual needs and right to privacy will be considered when planning and reviewing online experiences.

IMPLEMENTATION

Cubby OOSH will:

- maintain policies, procedures and risk controls for the safe use of digital technologies and online environments, including the requirements of Regulation 168(2)(ha);
- use reasonable supervision, device settings, privacy controls, content controls and educator guidance appropriate to the activity, children's ages and identified risks;
- support children to build digital literacy, critical thinking, respectful online behaviour, help-seeking skills and an understanding of privacy and personal information;
- consult children about what helps them feel safe online and involve them in developing age-appropriate expectations for technology use;
- support children to tell an educator if they see or experience something online that is upsetting, unsafe, inappropriate or confusing, without blame or shame;
- communicate with families about significant online safety matters and provide reputable information where useful; and
- review online risks, platforms and practices as technologies, legislation and service circumstances change.

CHILDREN'S ACCESS AND SUPERVISION

- Online access will be planned and supervised according to the nature of the activity and level of risk. Active supervision does not require an educator to continuously view every screen where a risk assessment supports age-appropriate independence.
- Children may use approved online resources for learning, creativity, games, research, music, movies, shows and other leisure-based experiences consistent with the Service program and the Screen, Media & Digital Technology Policy.
- Content does not need to have a formal educational purpose on every occasion. Cubby OOSH is a leisure-based school-age care service and children's requests, interests, relaxation and social recreation may appropriately inform digital experiences.
- Age classifications, advertising, chat functions, in-app purchases, external links, user-generated content and live communication features will be considered before or during use as relevant.
- Children will not be required to participate in optional screen or online activities and reasonable alternative experiences will be available.

PERSONAL DEVICES USED BY CHILDREN

- Children's personal phones, smart watches, tablets or other connected devices may only be used where permitted by the Nominated Supervisor/Responsible Person and in accordance with service expectations, family arrangements and identified risks.
- Reasonable exceptions may be made for disability, medical, safety, communication or other individual needs. Restrictions will be applied proportionately and respectfully.
- Children must not use personal devices to photograph, record or share images, audio or personal information about other children, educators or families without appropriate permission.

STAFF, VOLUNTEER AND SERVICE DEVICES

From 27 February 2026, strengthened National Law requirements apply to digital devices in centre-based education and care services. Cubby OOSH will ensure:

- staff members, educators, volunteers and other persons covered by the National Law do not use or have a personal device in their possession or control while working directly with children, except where a lawful exception or approved authorisation applies;
- only service-supplied devices are used to capture, store or transmit images of children for education and care purposes, subject to the National Law and any permitted exception;
- service-supplied devices are used only for authorised service purposes and are protected by appropriate access controls, passwords, updates and secure storage;
- images and recordings of children are captured only when appropriate, respectful and consistent with enrolment permissions, privacy requirements, child safety requirements and the child's dignity and wishes where practicable; and
- personal devices are stored in accordance with service procedures when a person is working directly with children.

PRIVACY, IMAGES AND INFORMATION

- Children's personal information, images, videos, names and identifying details will only be collected, accessed, stored, shared or published for legitimate service purposes and in accordance with applicable privacy, child safety and authorisation requirements.
- Images will not be taken in circumstances that compromise a child's dignity, including toileting, changing or other highly private situations, except where strictly necessary for an emergency or lawful safeguarding purpose.

- Access to service accounts, cloud storage and platforms will be limited to authorised persons. Access will be removed when no longer required.
- Educators must not communicate privately with children through personal social media, messaging accounts or other unauthorised online channels.

ONLINE SAFETY EDUCATION

Educators will use age- and developmentally appropriate opportunities to reinforce practical messages such as:

- be safe - protect personal information, passwords and location details;
- be kind - communicate respectfully and do not participate in bullying, exclusion or harmful sharing;
- ask for help - tell a trusted adult when something online feels wrong, upsetting or unsafe; and
- make good choices - pause before clicking, sharing, downloading, responding or communicating with unknown people.

CYBERBULLYING, UNSAFE CONTACT AND INAPPROPRIATE CONTENT

- Educators will respond calmly and supportively when a child reports cyberbullying, grooming concerns, unsafe contact, inappropriate content or other online harm.
- Where appropriate, the content or interaction will be stopped or access restricted without unnecessarily deleting potential evidence required for safeguarding or reporting.
- The Nominated Supervisor/Responsible Person will assess the matter under relevant child protection, incident, complaint and reportable conduct procedures and escalate to Police, the eSafety Commissioner, the Office of the Children's Guardian, the Regulatory Authority or another agency where required.
- Families will be informed where appropriate, taking account of the child's safety, privacy and any direction from authorities.

CYBERSECURITY AND SERVICE SYSTEMS

- Service devices and accounts will use reasonable cybersecurity controls including strong passwords, access restrictions, software updates and secure networks where practicable.
- Suspicious links, unexpected login requests, malware, compromised accounts or suspected data breaches must be reported promptly to management and managed in accordance with service privacy and information-security procedures.
- Staff will not install unauthorised apps or software, connect unauthorised storage devices, or share service passwords with children or unauthorised persons.

ROLES AND RESPONSIBILITIES

- Approved Provider/Management: maintain compliant policies and systems, provide appropriate service-supplied devices, manage permissions and cybersecurity, and respond to significant incidents.
- Nominated Supervisor/Responsible Person: implement this policy, support educators, monitor online risks and respond to concerns.
- Educators and staff: follow device restrictions and service procedures, supervise appropriately, model safe behaviour, protect privacy and report concerns promptly.
- Children: participate in age-appropriate safety expectations, respect others and seek help when needed.
- Families: communicate relevant needs or concerns and support safe, respectful technology use.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Education and Care Services National Law (NSW) - including the paramount consideration for children's safety, rights and best interests and current digital-device/image requirements, including sections 175H and 175I as applicable.
- Education and Care Services National Regulations - including Regulation 168(2)(ha) (safe use of digital technologies and online environments), and Regulations 170-172 relating to policies and procedures.
- Children's Guardian Act 2019 (NSW) and NSW Child Safe Standards - particularly Standard 8: physical and online environments minimise the opportunity for abuse to occur.
- Privacy Act 1988 (Cth) and Australian Privacy Principles, where applicable.
- National Quality Standard - QA2 Children's Health and Safety, QA5 Relationships with Children and QA7 Governance and Leadership.
- My Time, Our Place: Framework for School Age Care in Australia V2.0.

SOURCES

- Australian Children's Education and Care Quality Authority (ACECQA) - Safe use of devices in education and care services; Information sheet: Using digital devices in centre-based education and care services; Guide to the National Quality Framework.
- eSafety Commissioner - online safety resources, professional learning and safe online environment guidance.
- NSW Office of the Children's Guardian - Child Safe Standards and Standard 8 guidance.
- Australian Signals Directorate / Australian Cyber Security Centre - cyber security guidance.
- United Nations Convention on the Rights of the Child.

REVIEW AND CONTINUOUS IMPROVEMENT

This policy will be reviewed at least annually and earlier where legislation, regulatory guidance, technology, identified risks or service practices change. Children, families and educators may contribute to review and improvement of online safety practices.

2.33 Safe Arrival of Children

INTRODUCTION

Cubby OOSH is committed to ensuring the safe arrival of children who travel between school, Cubby OOSH and any other education or early childhood service. These transition periods can present heightened risks and require clear responsibility, reliable communication, accurate attendance processes and active supervision.

This policy has been developed in consultation with educators and staff, families and, where applicable, children, as required by regulation 102AAB. Children's safety, rights and best interests are the paramount consideration in all decisions and actions relating to their arrival, departure and travel between services.

PURPOSE

To establish clear, service-specific procedures for the safe arrival of children, including school-to-OOSH transitions, walking groups, collection points and circumstances where transportation is provided or arranged by the service. The policy also clarifies who holds duty of care at each stage and the action to be taken when a child expected at the service cannot be accounted for.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisor/Responsible Person, educators, staff, volunteers, children and families. It applies particularly when a child travels between Cubby OOSH and a school, preschool, kindergarten, long day care service or other education or early childhood service.

PARAMOUNT CONSIDERATION

The safety, rights and best interests of children are the paramount consideration. Safe-arrival arrangements must never be based solely on convenience, routine or minimum staffing levels where the circumstances require stronger controls or additional supervision.

SAFE ARRIVAL RISK ASSESSMENT

The Approved Provider will ensure a safe arrival risk assessment is conducted in accordance with regulation 102AAC:

- at least once every 12 months;
- as soon as practicable after becoming aware of any circumstance that may affect the safe arrival of children; and
- before or when establishing arrangements where children travel between Cubby OOSH and another education or early childhood service.

The risk assessment will identify and assess relevant risks and specify controls, including:

- the age, developmental stage and individual needs of children;
- the roles and responsibilities of parents, educators, staff of the other service and any other relevant person;
- the proposed route, collection/meeting points, entrances, gates, roads, car parks and other hazards;
- the process for transferring responsibility for each child and how that handover is confirmed;
- how attendance lists, bookings, school absences and changes to arrangements are communicated and reconciled;
- the number of educators required to provide adequate supervision, including children requiring additional support;

- communication methods and access to emergency contacts;
- weather, visibility, crowds, school events, altered gates/routes and other circumstances that may change risk; and
- the action to be taken if a child is expected but cannot be located or does not arrive as planned.

SAFE ARRIVAL PROCEDURES

School to OOSH / Afternoon Collection

- Before collection, educators will use the current service attendance/booking information and any confirmed absence or change notifications.
- Educators will attend the agreed collection point at the required time and actively supervise children during handover and travel.
- Children will be marked present only when physically sighted and responsibility has transferred to Cubby OOSH.
- A roll call/head count will be completed at appropriate transition points and reconciled on arrival at the service.
- Educators will follow the service-specific route and safe-arrival risk assessment. Any necessary route change will be communicated and managed using appropriate risk controls.

If a Child Expected at OOSH Does Not Arrive

- Immediately check the attendance/booking record and confirm whether an authorised absence or change has been received.
- Promptly contact the school/other education service and the child's parent/authorised nominee while maintaining supervision of all other children.
- Check the agreed collection point and other reasonable locations in accordance with the service procedure without leaving other children inadequately supervised.
- Escalate immediately to the Nominated Supervisor/Responsible Person.
- If the child cannot be promptly accounted for, or there is any reason to believe the child may be at immediate risk, contact Police on 000 without delay. There is no mandatory waiting period before contacting emergency services.
- Continue to follow directions from Police and communicate with the family, school and management.
- Complete required incident records and notify the Regulatory Authority where the circumstances meet a notification requirement. The service's internal review must not delay a statutory notification.

Morning / OOSH to School Handover

- Children remain under Cubby OOSH duty of care until responsibility is transferred in accordance with the documented arrangement with the school or other service.
- Educators will follow the agreed handover location and process and ensure children are accounted for before the OOSH group disperses or educators leave the handover area.
- Any child who cannot be safely handed over will remain supervised while the school, family and Nominated Supervisor/Responsible Person are contacted.

ARRIVAL AND DEPARTURE AT THE SERVICE

- Attendance records will be maintained in accordance with regulation 158, including each child's name, date and time of arrival/departure and the required signature or recording by an authorised person/educator as applicable.

- Children will only leave the service premises in circumstances permitted by regulation 99, including with a parent or authorised nominee, under written authorisation, on an authorised excursion/transportation arrangement, or for emergency medical care.
- Where a collection person is not known to educators, identification will be checked against the child's authorised collection information before the child is released.
- Changes to collection or travel arrangements must be communicated through an approved service channel and shared with relevant educators before the transition occurs.

SUPERVISION

Adequate supervision is determined by risk, not solely by the minimum educator-to-child ratio. During travel and handover, educators must know where children are, be able to respond immediately and position themselves to manage foreseeable hazards.

- number, age, developmental stage and individual needs of children;
- visibility, accessibility and the physical environment;
- roads, car parks, gates, crowds, weather and the proposed route;
- educator experience and skill;
- children's medical, behavioural, disability or additional support needs; and
- the need for additional educators or altered grouping where the risk assessment indicates this is necessary.

TRANSPORTATION

Where Cubby OOSH provides or arranges regular transportation, the separate Transportation Policy and regulations 102B–102F apply in addition to this policy. Required transport risk assessments, authorisations, embarking/disembarking records and physical vehicle checks must be completed.

CHILDREN'S VOICE AND SAFE PRACTICES

Children will be supported to understand age-appropriate safe-arrival routines, meeting points, road and pedestrian safety, who they should go to for help and what to do if plans change. Children's feedback about routes, collection points and places where they feel unsafe will be considered in risk assessments and service review.

RESPONSIBILITIES

Approved Provider / Management

- Ensure compliant safe-arrival policies, procedures and risk assessments are in place and reviewed as required.
- Ensure appropriate consultation with staff, families and children.
- Ensure identified risks result in timely changes to procedures and that risk assessment records are retained.

Nominated Supervisor / Responsible Person

- Implement this policy and service-specific procedures and ensure educators understand their responsibilities.
- Ensure current attendance, booking, authorisation and emergency contact information is accessible.
- Coordinate with schools and other services so duty-of-care handover arrangements are clear and understood.
- Respond immediately to a child who cannot be accounted for and ensure required records and notifications are completed.

Educators and Staff

- Follow the current risk assessment, collection route, roll-call and handover procedure.
- Maintain active supervision and accurate attendance records.
- Immediately report discrepancies, missing children, hazards or changes affecting safe arrival.

Families

- Provide current enrolment, authorisation and emergency contact information.
- Notify the service as early as possible when a child will be absent from school/OOSH or collection arrangements change.
- Ensure authorised nominees understand the service's arrival and departure requirements.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Children (Education and Care Services) National Law (NSW) – paramount consideration; sections 165, 167 and 175 as applicable
- Education and Care Services National Regulations – regulations 99, 102AAB, 102AAC, 102B–102F (where transportation applies), 122, 123, 158, 160–161, 168(2)(gb), 170–172 and 176 as applicable
- National Quality Standard – Quality Area 2, including Element 2.2.1; Quality Area 6, including Element 6.2.1; and Quality Area 7
- Children's Guardian Act 2019 (NSW) and NSW Child Safe Standards
- My Time, Our Place: Framework for School Age Care in Australia V2.0

SOURCES

- ACECQA – Policy and Procedure Guideline: Safe Arrival of Children (updated 24 March 2026)
- ACECQA – QA2 Information Sheet: Safe Arrival of Children
- ACECQA – Guide to the National Quality Framework (2026)
- NSW Department of Education – Transporting Children Safely / OOSH regulatory guidance
- NSW legislation – Education and Care Services National Regulations (current NSW version)

2.34 Safe Use of Digital Technologies and Online Environments Policy

INTRODUCTION

Cubby OOSH recognises that digital technologies can support communication, creativity, learning, leisure and connection for school-age children. Their use must also protect children from online harm, inappropriate content, privacy breaches and unsafe image or device practices.

This policy addresses the safe use of digital technologies and online environments, including images and videos of children, service-supplied devices, children's use of digital devices, online platforms and optical surveillance where used.

PURPOSE

To ensure digital technology is used in a child-safe, lawful and age-appropriate way, with the safety, rights, privacy, dignity, wellbeing and agency of children as the paramount consideration.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisors, Responsible Persons, educators, staff, students, volunteers, contractors, visitors, families and children in all Cubby OOSH before school, after school and vacation care programs, including excursions and transport where service devices are used.

POLICY STATEMENT

- Cubby OOSH will maintain policies and procedures for the safe use of digital technologies and online environments as required by Regulation 168(2)(ha).
- From 27 February 2026, centre-based services must comply with the National Law requirements restricting personal devices and requiring service-supplied devices when nominated supervisors, staff members and volunteers capture, store or transmit images of children.
- Digital experiences will reflect the leisure-based nature of OOSH. Children may request and participate in age-appropriate movies, television programs, music, games and other digital leisure experiences as part of the program, consistent with the Screen, Media & Digital Technology Policy.
- Children will be supported to make choices about digital participation and, where practicable, alternative experiences will be available.
- Digital technology will never replace adequate supervision, respectful relationships, active play, social interaction or a varied leisure-based program.

SERVICE-SUPPLIED AND PERSONAL DEVICES

- Only service-supplied devices may be used by nominated supervisors, staff members and volunteers to capture, store or transmit images of children while providing education and care, except where the National Law expressly permits otherwise.
- Service-supplied devices will be configured and managed in accordance with child-safety and device-security procedures, including passwords, access controls, approved applications, secure networks and software/security updates.

- Personal devices capable of capturing, storing or transmitting images include phones, tablets, cameras, smart watches, smart glasses, USB drives, memory cards and hard drives.
- Staff and volunteers must not use or have personal devices while working directly with children except where a lawful exception or written authorisation applies. Any authorisation must meet the National Law and prescribed record-keeping requirements.
- Personal devices must otherwise be securely stored away from children and not used to photograph, film, record, store or transmit information or images relating to children.
- Service devices must not be used for unauthorised personal communication, personal social media or other non-service purposes.

CHILDREN'S USE OF DIGITAL TECHNOLOGIES

- Children may use approved service devices and digital resources for leisure, creativity, research, games, music, movies, shows, communication and educational experiences appropriate to the OOSH program.
- Content will be age-appropriate and selected with consideration of classification, children's ages, maturity, interests, family information and the context of the group.
- Children's digital use will be actively supervised in a way that is proportionate to the activity, device, platform, age and identified risks.
- Children will receive age-appropriate guidance about privacy, respectful communication, cyberbullying, scams, unsafe contact, inappropriate content, sharing personal information and seeking help.
- Children are encouraged to tell an educator if something online makes them uncomfortable, unsafe, confused or worried. Reports will be taken seriously and managed without blame.
- Personal phones, smart watches or other internet-enabled devices brought by children will be managed in accordance with service procedures, family agreements and individual medical/accessibility needs. Their use must not compromise the privacy or safety of other children.

IMAGES AND VIDEOS OF CHILDREN

- Images and videos will only be taken, used, stored or shared for authorised service purposes and in accordance with current parent/authorised nominee permissions.
- Children's dignity, privacy and agency will be respected. Where developmentally appropriate, educators will seek the child's agreement before taking or using an image and respect a child who does not wish to be photographed or recorded.
- Images must not be taken in circumstances that are undignified, highly personal or likely to expose a child to embarrassment, exploitation or harm.
- Images and videos will be stored only on approved service systems/platforms with access limited to authorised persons and retained only for as long as required for the authorised purpose or applicable record-keeping obligation.
- Withdrawal or change of family authorisation will be actioned prospectively as soon as practicable. Existing records will be managed in accordance with legal record-retention, privacy and operational requirements.
- Images must not be copied to personal devices, personal cloud storage, private messaging accounts or personal social media.

ONLINE PLATFORMS, CONTENT AND CYBERSECURITY

- Only approved platforms, applications, websites and accounts are to be used for service operations or children's activities.
- Reasonable security controls will be maintained, including strong passwords, restricted permissions, secure Wi-Fi, updates, backups where appropriate and prompt removal of access when a person no longer requires it.
- Filtering and safe-search controls may be used as one safeguard but do not replace educator supervision and professional judgement.
- Suspected phishing, malware, unauthorised access, loss of a device, privacy breach or other cybersecurity incident must be reported immediately to the Nominated Supervisor/Approved Provider and managed under applicable privacy, child-protection and incident procedures.

ONLINE SAFETY AND CHILD PROTECTION

- Online grooming, sexualised communication, cyberbullying, coercion, image-based abuse, exposure to harmful content or other suspected harm will be responded to as a child-safety concern.
- Educators must preserve relevant information where safe and appropriate, report internally immediately and follow the Child Protection Policy, mandatory reporting/reportable conduct requirements and emergency procedures where applicable.
- Where there is an immediate risk to a child, contact emergency services on 000. Matters involving online harm may also be referred to Police, the eSafety Commissioner or other relevant authority as appropriate.
- Children will not be blamed or punished for disclosing online harm or accidentally encountering unsafe content.

OPTICAL SURVEILLANCE / CCTV (WHERE APPLICABLE)

- Any CCTV or other optical surveillance used by the service will have a defined lawful purpose, appropriate signage/notice where required, restricted access and secure storage.
- Surveillance will not be installed or used in toilets, change areas or other places where children have a reasonable expectation of bodily privacy.
- Footage will only be accessed, disclosed, retained and destroyed for authorised purposes and in accordance with applicable law and service procedures.

VISITORS, STUDENTS AND CONTRACTORS

- Visitors, students and contractors must follow service directions about personal devices, photography, recording and online access.
- No visitor, student or contractor may photograph, film or record children unless specifically authorised and lawful safeguards are in place.
- Personal device restrictions applying under the National Law must be followed by relevant persons.

RESPONSIBILITIES

Approved Provider / Management

- Ensure current policies, secure service-supplied devices, systems and appropriate controls are in place.
- Ensure personal-device authorisations, where legally permitted, are documented as required.

- Respond to significant breaches, child-safety concerns and privacy/cybersecurity incidents and notify relevant authorities where required.

Nominated Supervisor / Responsible Person

- Implement this policy, monitor practice and ensure educators, volunteers, students and visitors understand relevant requirements.
- Ensure breaches or child-safety concerns are acted on promptly and escalated appropriately.

Educators and Staff

- Use digital technologies in accordance with this policy, maintain active supervision and protect children's privacy and dignity.
- Report unsafe content, device misuse, suspected online harm, privacy breaches or other concerns immediately.

Children and Families

- Children are encouraged to contribute to decisions about digital experiences and online-safety expectations and to seek help when needed.
- Families are encouraged to keep image/video permissions and relevant information current and communicate concerns or individual needs to the service.

STATUTORY LEGISLATION & CARE CONSIDERATIONS

- Children (Education and Care Services) National Law (NSW), including the paramount consideration of child safety, welfare and wellbeing and Part 6A - Devices in education and care services (as applicable).
- Education and Care Services National Regulations (NSW), including Regulation 168(2)(ha), Regulations 170-172 and Regulation 179A as applicable.
- National Quality Standard: Quality Area 2 - Children's Health and Safety; Quality Area 5 - Relationships with Children; Quality Area 7 - Governance and Leadership.
- Children's Guardian Act 2019 (NSW) and NSW Child Safe Standards, including Standard 8 - physical and online environments minimise opportunities for abuse.
- Privacy Act 1988 (Cth), Australian Privacy Principles where applicable, and Workplace Surveillance Act 2005 (NSW) where applicable.

SOURCES

- ACECQA - Safe use of devices in education and care services and 2026 information sheet for centre-based services.
- ACECQA - Guide to the National Quality Framework (2026).
- NSW legislation - Children (Education and Care Services) National Law (NSW) and Education and Care Services National Regulations (NSW).
- eSafety Commissioner - online safety resources for children, families and organisations.
- NSW Office of the Children's Guardian - Child Safe Standards.

CUBBYOOSH

ACTIVE & ENGAGING OUT OF SCHOOL HOURS CARE

Quality Area 3

CUBBY OOSH QUALITY AREA 3 POLICY UPDATE REGISTER

Physical Environment: September 2026

Policy Number	Policy Name	What Changed – September 2026
3.01a	**Physical Activity Policy**	Updated to current Australian 5–17 movement guidance and MTOP V2.0. • Clarified OOSH is leisure-based: active play is encouraged but participation is not forced. • Removed blanket bans on challenging/risky play and replaced them with risk-benefit assessment and proportionate controls. • Clarified that the NSW OOSH 1:15 ratio does not by itself establish adequate supervision. • Added inclusive participation, child agency, weather/heat/air-quality controls and safe equipment/environment checks. • Paramountcy included where physical activity or supervision decisions affect children's safety, rights or best interests.
3.01	**Child Safe Environment Policy**	Strengthened child-safe environment requirements across physical and online environments. • Added clear paramountcy requirements: children's safety, rights and best interests prevail over competing operational, financial or convenience interests. • Corrected excursion/walking/water supervision wording: the old blanket 1:10, 1:8 and 1:5 figures are not universal NSW legal ratios. • Strengthened adequate supervision, lines of sight, privacy/dignity, visitors/contractors and shared school-site arrangements. • Updated NSW WWCC, child protection and 2026 child-safety requirements. • Added documentation of how paramountcy influences significant decisions.

3.02	**Maintenance of Buildings, Grounds & Equipment Policy**	Rebuilt maintenance processes around QA3 upkeep, safe premises and current NSW WHS requirements. • Added daily environmental checks, hazard prioritisation, maintenance tracking and verification before equipment/areas return to use. • Strengthened shared school-site responsibilities and escalation of school-owned maintenance issues. • Added playground/soft-fall, grounds, electrical, hazardous products, contractor and accessibility controls. • Removed outdated interstate WHS references and updated to NSW WHS Act 2011 / WHS Regulation 2025. • Paramountcy included where maintenance, repair, budgeting or operational decisions affect children's safety or best interests.
3.03	**Pest Control Policy**	Updated to a prevention-first, risk-based pest-management approach. • Prioritises hygiene, exclusion and non-chemical controls before pesticide use. • Added controls for pesticides, baits, traps, SDS, storage, re-entry periods and contractors. • Strengthened shared school-site communication, family notification and treatment records. • Updated guidance for snails/slugs and rat lungworm, rodents and biting/stinging insects. • Paramountcy included only where pest-control or chemical-treatment decisions directly affect children's health or safety.
3.04	**Electrical Equipment Safety, Inspection & Tagging Policy**	Corrected the old blanket rule that all electrical equipment must legally be tested/tagged every 12 months. • Testing/tagging is now based on current NSW WHS requirements, equipment risk and hostile operating environments. • Added competent-person testing requirements, testing records and RCD/safety-switch requirements. • Strengthened visual checks, fault isolation, power-board/cord safety, repairs and school-owned electrical equipment. • Clarified licensed electrical work versus competent in-service testing. • Child-safety/paramountcy wording included only where electrical safety decisions directly affect children.

3.05	**Environmental Sustainability Policy**	Updated to MTOP V2.0 and the broader environmental, social and economic approach to sustainability. • Strengthened NQS Element 3.2.3 – Environmentally Responsible. • Added children's voice, agency and genuine participation in sustainability decisions. • Updated natural environments, recycling/waste, water, energy, biodiversity, sustainable purchasing and community partnerships. • Added respectful Aboriginal and Torres Strait Islander connections to Country/Place and caring for land and waters. • Removed outdated prescriptive environmental claims and replaced them with current, contextual practice. • Paramountcy included only where a sustainability initiative could conflict with a child's health, safety, inclusion, dignity, rights or best interests.

3.01 CHILD SAFE ENVIRONMENT POLICY

INTRODUCTION

Cubby OOSH is committed to providing school-age care environments in which children are safe, respected, listened to and supported to participate, explore, develop independence and enjoy leisure time. A child safe environment includes the physical premises, supervision arrangements, people, practices, equipment, digital environments and organisational culture that surround children while they are in our care.

From 27 February 2026, the safety, rights and best interests of children are a paramount consideration for all people involved in the operation and delivery of an education and care service. This obligation informs all decisions and actions under this policy.

PURPOSE

This policy establishes the service-wide approach to preventing and responding to foreseeable risks of harm, hazards, abuse and unsafe environments while supporting children's rights, agency, development and participation. In every decision and action concerning a child or children, Cubby OOSH will treat their safety, rights and best interests as paramount. Where those interests conflict with the interests, convenience, financial considerations or other obligations of the service or Approved Provider, the rights and best interests of the child or children will prevail.

SCOPE

This policy applies to the Approved Provider, persons with management or control, Nominated Supervisor, Responsible Persons, educators, staff, students, volunteers, contractors, visitors, children and families across before school care, after school care, vacation care, excursions, transportation and shared school-site spaces.

PARAMOUNTCY OF CHILDREN'S SAFETY, RIGHTS AND BEST INTERESTS

Cubby OOSH recognises paramountcy as a legal duty and a core child-safe practice. The safety, rights and best interests of children will be the paramount consideration in all decisions and actions affecting the operation and delivery of the service.

• If a conflict arises between the rights or best interests of a child or children and the interests of the service, Approved Provider, staff, families, financial considerations, operational convenience or another competing obligation, the rights and best interests of the child or children will prevail.

• Paramountcy will guide day-to-day supervision, staffing, enrolment and participation decisions, risk assessments, complaints, incident responses, recruitment, physical and online environment decisions, excursions, transportation and responses to child-safety concerns.

• Significant or complex decisions will record how children's safety, rights and best interests were considered and how the paramountcy principle influenced the outcome.

• Children's views, experiences and expressed concerns will be sought and considered in an age-appropriate way wherever decisions affect them.

• No commercial, reputational, staffing, scheduling or convenience consideration will justify delaying or weakening action required to protect a child.

• All staff, volunteers and students are expected to raise concerns and take timely action where a decision or practice may not place children's safety, rights and best interests first.

CHILD SAFE PRINCIPLES

- Children's safety, rights and best interests are the paramount consideration in all decisions and actions affecting them.
- Children are encouraged to express their views about what makes them feel safe or unsafe and are given age-appropriate ways to raise concerns or seek help.
- Physical and online environments are assessed and managed to minimise opportunities for abuse or harm without unnecessarily restricting children's privacy, independence, healthy development or access to appropriate experiences.
- Child safety is everyone's responsibility. Concerns about abuse, neglect, grooming, inappropriate conduct, unsafe practice or breaches of the Code of Conduct are acted on promptly and reported as required.
- Children are treated with dignity and respect. No child is subjected to corporal punishment, inappropriate discipline, humiliating, degrading, intimidating or other inappropriate conduct.

ADEQUATE SUPERVISION

- Children must be adequately supervised at all times, including indoors, outdoors, during transitions, excursions and transportation provided or arranged by the service.
- NSW OOSH services operate at a minimum educator-to-child ratio of 1:15 for children over preschool age. Meeting the minimum ratio does not, by itself, establish adequate supervision.
- Adequate supervision requires educators to know where children are, monitor their activities actively and diligently and be able to respond immediately, particularly when a child is distressed or exposed to a hazard.
- Supervision plans and educator positioning will consider the environment, blind spots, mixed-age groups, activity risk, children's abilities and support needs, bathrooms and change areas, arrivals/departures and shared school spaces.
- Excursions, walking activities, water activities and other higher-risk experiences will use the staffing and supervision level identified by the specific risk assessment. The service will not treat old blanket ratios such as 1:10, 1:8 or 1:5 as universal NSW legal ratios.

PHYSICAL ENVIRONMENT, PREMISES AND EQUIPMENT

- Premises, furniture and equipment must be safe, clean and in good repair and arranged to support effective supervision and children's participation.
- Daily opening and ongoing hazard checks will identify issues such as damaged equipment, unsafe surfaces, trip hazards, sharp objects, blocked exits, unsafe gates or fencing, pooled water, heat, smoke, poor air quality and hazards created by other users of a shared school site.
- Hazards presenting an immediate risk will be removed, isolated or made inaccessible without delay. Other maintenance issues will be recorded and escalated according to risk and urgency.
- Indoor and outdoor environments will support inclusion, movement, quiet play, creativity, social connection, privacy appropriate to school-age children and access to natural environments where available.

- Children may participate in age-appropriate adventurous or risky play where benefits and foreseeable hazards have been considered and reasonable controls are in place. The aim is not to eliminate all challenge.

CHILD SAFE PHYSICAL AND ONLINE ENVIRONMENTS

- Areas where adults interact with children will be arranged, where practicable, to support natural lines of sight and observable professional practice while respecting children's privacy and dignity.
- Higher-risk or secluded areas will be identified in supervision plans and risk assessments and managed through positioning, access controls, environmental changes or other appropriate safeguards.
- Digital and online environments will be managed in accordance with the service's Safe Use of Digital Technologies and Online Environments and Online Safety policies, including current 2026 personal-device and image requirements.
- Visitors and contractors will be managed so their access and interactions do not create unacceptable risks to children. Children will not be placed in unsupervised contact with unauthorised adults.
- Children will be consulted about their experience of safety in physical and online environments and their feedback will inform reviews and improvements.

HAZARDOUS PRODUCTS AND STORAGE

- Hazardous chemicals, cleaning products, medications, tools, sharp objects and other dangerous products will be stored, labelled and handled in accordance with the service's Dangerous Products Policy, applicable Safety Data Sheets and WHS requirements.
- A hazardous chemical register and current Safety Data Sheets will be maintained where required by WHS legislation. Consumer products used in a manner consistent with ordinary household use will be managed according to the applicable legal requirements and risk.
- Food, medication and hazardous products will be stored separately and securely as appropriate. Children will not have unsupervised access to products that could cause harm.

RISK MANAGEMENT

Risk management is continuous and proportionate to the circumstances. It includes identifying hazards and child-safety risks, assessing likelihood and consequence, implementing effective controls, monitoring those controls and reviewing them when circumstances change.

- Risk assessments will be completed where required by the National Regulations and whenever a planned activity, environment, equipment, excursion, transportation arrangement, contractor, event or change creates a risk that requires formal assessment.
- Risk assessments will consider both physical hazards and child-safety risks, including opportunities for abuse, grooming, inappropriate one-to-one interactions, privacy concerns and online risks.
- Children's views may be included in risk assessment and risk-benefit discussions where appropriate to their age and understanding.
- An incident, near miss, complaint, environmental change or identified weakness will trigger review of relevant controls rather than automatic removal of beneficial experiences where risks can be reasonably managed.

Child Protection Registry

Cubby OOSH will maintain a secure Child Protection Concerns Register to record and monitor child safety concerns, disclosures, allegations and actions taken. Each entry will include the date the concern was identified, a factual description of the concern, immediate safety measures, reports or referrals made, the person responsible for follow-up and the outcome, where known. Access will be restricted to authorised personnel, and all records will be managed confidentially in accordance with applicable legal and recordkeeping requirements. Maintaining the register does not replace individual incident records, mandatory reporting or other required notifications.

RECRUITMENT, WWCC AND CHILD SAFE INDUCTION

- Recruitment and induction processes will reflect the NSW Child Safe Standards and assess suitability to work with children, professional boundaries and commitment to child-safe practice.
- Required Working with Children Check clearances will be verified through the NSW Office of the Children's Guardian before a person is engaged in child-related work, subject to any lawful exemption.
- The service will maintain required WWCC and staff records, monitor clearance status and respond immediately to bars, interim bars, prohibition notices or other information affecting a person's suitability or legal ability to work with children.
- Staff, volunteers and students will receive induction on the Child Safe Standards, Code of Conduct, supervision, reporting pathways, child protection, complaints, digital safety, emergency procedures and site-specific hazards.
- Required child protection and child safety training will be completed and kept current in accordance with the National Law, Regulations and NSW requirements.

CHILD PROTECTION AND REPORTING

- Educators and management will understand and comply with their child protection, mandatory reporting, reportable conduct and regulatory notification obligations.
- Concerns, disclosures and allegations will be responded to in a child-centred way, documented securely and shared only with people or authorities who need the information for safety, legal or operational reasons.
- Internal investigation or management review will never delay a mandatory report, emergency response or statutory notification.
- Where there is an immediate threat to a child or another person, educators will contact 000 and take reasonable steps to protect children while maintaining supervision.

ARRIVAL, DEPARTURE AND ACCOUNTING FOR CHILDREN

- Accurate attendance and arrival/departure records will be maintained as required by the National Regulations and used actively to account for children throughout the session.
- Authorised collection arrangements and identity checks will be followed where the collecting person is not known to educators.
- Discrepancies in attendance, expected arrivals or departures will be investigated immediately in accordance with the Safe Arrival of Children, Delivery and Collection and Transportation policies.
- No mandatory waiting period applies before contacting Police or 000 when a child cannot be promptly accounted for and circumstances indicate an immediate safety risk.

SHARED SCHOOL-SITE ENVIRONMENTS

- Where Cubby OOSH operates on a school site, the service will coordinate with the school/site controller about access, gates, maintenance, contractors, emergency arrangements, shared areas and hazards that may affect OOSH children.
- Service approval boundaries, authorised play areas and transition routes will be known to educators and reflected in supervision and risk controls.
- Hazards outside the service's direct control will be reported to the school/site controller and interim controls implemented until the issue is resolved.

ROLES AND RESPONSIBILITIES

- The Approved Provider and Nominated Supervisor will ensure systems, staffing, training, risk management, maintenance and policies support a child safe environment and comply with current law.
- Responsible Persons and educators will implement daily checks, supervision arrangements, risk controls and reporting procedures and escalate hazards or child-safety concerns promptly.
- Children will be supported to understand safety expectations, identify hazards, make age-appropriate decisions and speak up about concerns.
- Families will be encouraged to share information relevant to their child's safety, participation and support needs and to raise concerns through the service's complaints process.

CONTINUOUS IMPROVEMENT

This policy will be reviewed at least annually and earlier following legislative change, a serious incident, complaint, identified systemic risk, significant change to the premises or service operations, or feedback from children, families, educators or relevant authorities. Reviews will consider whether controls remain effective and whether children's rights, privacy, agency and healthy development are being appropriately balanced with safety.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and the Education and Care Services National Law (NSW), including the paramount consideration requirement, sections 165, 166A and 167 and other applicable child-safety provisions.
- Education and Care Services National Regulations (NSW), including regulations 82–84A as applicable, 85–87, 99, 102AAC, 102B–102F where applicable, 103–115, 122–123, 136, 155–156, 158, 168, 170–172, 175–177 and 183 as applicable.
- Children's Guardian Act 2019 (NSW), Child Protection (Working with Children) Act 2012 (NSW) and NSW Child Safe Standards.
- Children and Young Persons (Care and Protection) Act 1998 (NSW).
- Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2025.
- National Quality Standard, particularly QA2, QA3 and QA7.

SOURCES / GUIDELINES

- ACECQA – Guide to the National Quality Framework and strengthened NQF child safety resources (2026).
- ACECQA – Understanding Paramount Consideration (2026).
- NSW Early Learning Commission – Guidance for Outside School Hours Care Services (2026).
- NSW Office of the Children's Guardian – Child Safe Standards, including Standard 8: Physical and online environments minimise the opportunity for abuse to occur.

- My Time, Our Place – Framework for School Age Care in Australia V2.0.
- United Nations Convention on the Rights of the Child.

3.01A PHYSICAL ACTIVITY POLICY

INTRODUCTION

Cubby OOSH recognises physical activity, movement, active play and appropriate opportunities for challenge as important parts of school-age children's health, wellbeing, learning and leisure. As an outside school hours care service, our program balances active play with social, creative, quiet and rest choices and is guided by children's interests, abilities, culture, agency and individual needs.

The service supports the Australian Government physical activity and 24-hour movement recommendations for children and young people aged 5–17 years. These are whole-of-day health recommendations and are not an inflexible requirement that must be completed during an individual OOSH session.

PURPOSE

To provide safe, inclusive and enjoyable opportunities for children to be physically active while protecting their rights, dignity, health and safety. In all decisions and actions affecting children, their safety, rights and best interests are a paramount consideration.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisor, Responsible Persons, educators, staff, students, volunteers, visitors, contractors, children and families across before school care, after school care, vacation care, excursions and other service activities.

NATIONAL QUALITY FRAMEWORK

- National Law: adequate supervision and reasonable precautions to protect children from harm and hazards, including the strengthened child-safety and paramount-consideration requirements applying in 2026.
- National Regulations: educational program requirements; incident, injury, trauma and illness requirements; safe premises, furniture and equipment; outdoor natural environment and shade; premises designed to facilitate supervision; interactions and relationships with children; and required policies and procedures.
- National Quality Standard: QA1 Educational program and practice; QA2 Children's health and safety; QA3 Physical environment; QA5 Relationships with children; and QA7 Governance and leadership.
- My Time, Our Place – Framework for School Age Care in Australia V2.0.

PHYSICAL ACTIVITY AND LEISURE-BASED PRACTICE

- Children will have regular opportunities for active play each day, indoors and outdoors where appropriate, through both child-initiated and educator-supported experiences.
- Experiences may include running games, football, basketball, netball, handball, dancing, skipping, obstacle courses, climbing, balancing, bike or scooter activities, yoga, movement games and other activities appropriate to the environment and risk assessment.
- Children will not be forced to participate in physical activity. Their choice to rest, observe, engage in quieter play or participate in another suitable experience will be respected.
- Educators will recognise that OOSH is leisure time outside the school day. Physical activity will be promoted positively without turning leisure experiences into compulsory fitness sessions.

- Children's ideas and requests will inform the physical environment, equipment choices, games, rules and opportunities for adventurous or challenging play.
- Competitive activities will be managed inclusively and respectfully, with attention to children's abilities, confidence, emotional wellbeing and choice.

AUSTRALIAN MOVEMENT RECOMMENDATIONS – 5 TO 17 YEARS

Current Australian Government recommendations encourage children and young people aged 5–17 years to:

- undertake at least 60 minutes of moderate to vigorous physical activity each day, which can be accumulated in shorter periods;
- include vigorous activity and muscle- and bone-strengthening activity on at least 3 days each week;
- undertake several hours of light physical activity across the day;
- break up long periods of sitting where possible;
- limit sedentary recreational screen time to no more than 2 hours per day, noting this is a whole-of-day recommendation and excludes schoolwork; and
- obtain age-appropriate sleep, including 9–11 hours for children aged 5–13 years and 8–10 hours for young people aged 14–17 years.

Cubby OOSH supports these recommendations through a balanced program. Screen and media use is managed under the service's Screen, Media & Digital Technology and online safety policies; it is not required to have an educational purpose on every occasion.

RISK, CHALLENGE AND ADVENTUROUS PLAY

- The service recognises that age-appropriate challenge and adventurous play can support confidence, judgement, resilience, physical competence and problem solving.
- Activities will not be prohibited solely because they involve challenge. Educators will consider the benefits as well as foreseeable hazards and apply proportionate controls.
- Risk assessment will consider the activity, environment, equipment, weather, number and ages of children, individual abilities and support needs, educator positioning, foreseeable injuries and emergency response.
- Children will be involved, where appropriate, in identifying hazards, discussing safe boundaries and developing rules for games and equipment.
- Activities requiring specialist skills, equipment or venue controls will only proceed when suitable supervision, competence, authorisation and risk controls are in place.

ADEQUATE SUPERVISION

- Children must be adequately supervised at all times. The NSW OOSH minimum ratio of 1 educator to 15 children does not by itself establish adequate supervision.
- Educators must know where children are, actively and diligently monitor their activities and be able to respond immediately when a child is distressed or exposed to a hazard.

- Supervision plans, educator positioning and environmental layout will be adjusted for higher-risk activities, large outdoor areas, mixed-age groups, transitions, bathrooms, blind spots and individual support needs.
- Educators will maintain effective lines of sight and/or hearing as appropriate while also respecting the privacy and growing independence of school-age children.
- Where the assessed risk requires it, additional educators or a smaller activity group will be used.

SAFE PHYSICAL ENVIRONMENT AND EQUIPMENT

- Indoor and outdoor areas will be checked for hazards before and during use, including damaged equipment, sharp objects, slippery or uneven surfaces, unsafe structures, environmental hazards and changes caused by weather.
- Furniture, resources and equipment will be suitable for their intended use, maintained in safe and good repair and arranged to support participation and supervision.
- Fixed and moveable equipment will be used in accordance with relevant manufacturer instructions, applicable Australian Standards and service risk controls.
- Boundaries for ball games, wheeled activities and other active experiences will be set according to the environment and other users of the school or shared site.
- Unsafe equipment will be removed from use or isolated until repaired, replaced or otherwise made safe.

SUN, WEATHER, HYDRATION AND AIR QUALITY

- The Sun Protection Policy will be followed. Lack of a hat will not automatically mean exclusion from all outdoor play; suitable shade or other risk-managed alternatives will be considered.
- Drinking water will be readily accessible and children will be encouraged to hydrate before, during and after vigorous activity.
- Activities will be modified, relocated, postponed or ceased when heat, storms, lightning, smoke, poor air quality, wet surfaces or other environmental conditions create unacceptable risk.
- Children's clothing, footwear and individual medical needs will be considered when planning activities.

INCLUSION, EQUITY AND CHILDREN'S RIGHTS

- Reasonable adjustments will be made so children with disability, medical conditions, sensory needs, developmental differences or other support needs can participate meaningfully.
- Families and relevant professionals may be consulted about individual supports, while the child's own views and preferences are actively sought.
- Educators will avoid shaming, punishment, forced exercise or comparison of children's bodies, fitness, weight, coordination or sporting ability.
- Cultural games, traditional movement experiences and family knowledge may be incorporated respectfully into the program.

EDUCATORS WILL

- offer varied, enjoyable and age-appropriate active experiences alongside quiet and creative leisure choices;
- model safe participation, explain boundaries and demonstrate equipment use where necessary;
- encourage children to assess manageable risks and build skills rather than unnecessarily removing all challenge;

- monitor fatigue, distress, injury, overheating and individual medical needs;
- follow medical management, first aid, incident and emergency procedures where required;
- document significant learning, interests and program development in a manner consistent with MTOP V2.0 and the service's educational program requirements; and
- critically reflect with children and colleagues on participation, inclusion, supervision, incidents and the effectiveness of risk controls.

FAMILIES

- Families will have access to this policy and may share information relevant to their child's physical participation, culture, medical needs, abilities and interests.
- Families will be informed of significant incidents or injuries in accordance with Regulation 86 and the service's Incident, Injury, Trauma and Illness Policy.
- Where a child has an individual medical condition or support need, the relevant medical management and risk-minimisation processes will be followed.

INCIDENTS AND EMERGENCIES

- First aid will be provided promptly by appropriately trained staff and emergency services contacted when required.
- Incident, injury, trauma and illness records will be completed as required by the National Regulations.
- Serious incidents will be notified to the Regulatory Authority within the applicable statutory timeframe.
- Following an incident or near miss, educators will review the environment, supervision and controls without automatically removing valuable play opportunities where risks can be reasonably managed.

CONTINUOUS IMPROVEMENT

This policy and related risk controls will be reviewed at least annually and earlier following significant incidents, regulatory change, changes to the environment or equipment, or where feedback from children, families or educators identifies a need for review.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including sections 165 and 167 and the 2026 child-safety/paramount-consideration reforms.
- Education and Care Services National Regulations, including regulations 73, 76, 85–87, 103, 113–115, 155–156, 168 and other provisions applicable to the activity or setting.
- National Quality Standard – Quality Areas 1, 2, 3, 5 and 7.
- Children's Guardian Act 2019 (NSW) and NSW Child Safe Standards, including Standard 8.
- Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2025, as applicable.

SOURCES

- ACECQA, Guide to the National Quality Framework and 2026 National Quality Standard resources.
- NSW Early Learning Commission, Guidance for Outside School Hours Care Services and OSHC Supervision Toolbox.
- Australian Government Department of Health, Disability and Ageing, Recommendations for children and young people aged 5–17 years, updated March 2026.
- My Time, Our Place – Framework for School Age Care in Australia V2.0.

3.02 Maintenance of Buildings, Grounds & Equipment Policy

INTRODUCTION

Cubby OOSH is committed to maintaining buildings, grounds, fixtures, fittings, furniture, equipment and resources that are safe, clean, fit for purpose and in good repair. Maintenance is an ongoing child-safety responsibility and forms part of the service's systems for adequate supervision, risk management, inclusion and the prevention of harm and hazards.

PURPOSE

To establish clear systems for identifying, reporting, controlling and rectifying maintenance hazards in OOSH environments, including shared school premises. The service will maintain environments that support children's safety, wellbeing, participation, independence, play and learning.

PARAMOUNTCY OF CHILDREN'S SAFETY, RIGHTS AND BEST INTERESTS

The safety, rights and best interests of children are the paramount consideration in every maintenance, repair, purchasing, budgeting and operational decision affecting the service.

- Where a child's safety, rights or best interests conflict with cost, convenience, scheduling, service operations, property interests or another competing obligation, the rights and best interests of the child or children will prevail.
- A maintenance issue that creates an unacceptable risk to children will not remain in use simply because repair, replacement or closure is inconvenient or costly.
- Significant maintenance and risk decisions will record, where appropriate, how children's safety, rights and best interests were considered and how paramountcy influenced the outcome.
- Children's views and experiences will be considered when changes to spaces, equipment or access arrangements affect them.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisor, Responsible Persons, educators, staff, students, volunteers, contractors, visitors, children and families. It applies to indoor and outdoor OOSH areas, school-shared spaces used by the service, buildings, grounds, gates and fencing, fixed and moveable equipment, furniture, electrical items, playground surfaces, storage, amenities and service resources.

RESPONSIBILITIES

- The Approved Provider will ensure premises and all equipment and furniture used in providing the service are safe, clean and in good repair and that sufficient resources are available to rectify hazards.
- The Nominated Supervisor/Responsible Person will ensure daily operational checks occur, hazards are controlled promptly, maintenance is recorded and urgent matters are escalated.
- Educators and staff must report hazards or defects as soon as identified and take immediate reasonable action to prevent children accessing unsafe areas or equipment.
- Contractors and tradespeople must comply with service, school-site and WHS requirements and be appropriately licensed or competent for the work undertaken.

- Children and families are encouraged to raise concerns about the physical environment. Reports will be taken seriously and responded to promptly.

DAILY SAFETY AND ENVIRONMENT CHECKS

- Indoor Environment Checklist and Daily Hazards Identification Checklist will be completed for areas used by the service.
- Checks will consider access and egress, gates, doors, fences, playground equipment, surfaces, trip hazards, sharp or broken items, electrical hazards, furniture stability, water hazards, weather damage, vegetation, pests, lighting, ventilation and other foreseeable hazards.
- Checks are not a substitute for continuous observation. New hazards arising during a session must be addressed when identified.
- Where Cubby OOSH uses school-owned or shared premises, identified hazards will be communicated promptly to the school/site controller and interim controls implemented by the service.

MAINTENANCE AND HAZARD CONTROL

- Hazards will be assessed according to likelihood and potential consequence, with priority given to risks capable of causing serious harm.
- Unsafe equipment will be removed from use, isolated, locked away or clearly prevented from access until repaired, replaced or confirmed safe.
- Unsafe areas will be closed, barricaded or otherwise controlled. A sign or barrier alone will not be relied upon where children could reasonably bypass it.
- Urgent hazards will be escalated immediately to management and the relevant school/site contact or contractor.
- Non-urgent maintenance will be entered into the Maintenance Log and tracked until completion.
- Completed repairs will be checked before the area or equipment is returned to children's use.
- Recurring faults, near misses or repeated temporary repairs will trigger review of the underlying cause and whether replacement or redesign is required.

MAINTENANCE LOG

The Maintenance Log will record, as applicable:

- the hazard, defect or maintenance issue and its location;
- the date identified and person reporting it;
- the immediate control implemented;
- the priority/risk level and person responsible for follow-up;
- communications with the school/site controller, management or contractor where relevant;
- repair, replacement or other corrective action undertaken;
- the date completed and person/tradesperson completing the work; and
- confirmation that the item or area was checked before being returned to use.

BUILDINGS, FIXTURES AND SHARED SCHOOL SITES

- OOSH areas must remain fit for their approved and intended use and support safe access and participation by every child.

- Changes to walls, doors, gates, fencing, access routes, toilets, lighting, ventilation, fixed equipment or other building features will be assessed for child safety, supervision, accessibility and service approval implications.
- The service will coordinate with the school or other site controller where responsibility for repair or alteration rests with the property owner.
- Temporary changes to the environment, including building works or restricted access, will be reflected in supervision and risk controls.
- Emergency exits and evacuation routes must not be obstructed by maintenance work, storage or equipment.

FURNITURE, MATERIALS AND EQUIPMENT

- Furniture, materials and equipment will be suitable for their intended purpose, the ages, abilities and interests of children and the educational/leisure program.
- Items will be checked for stability, sharp edges, loose components, breakage, entrapment, choking or other foreseeable hazards relevant to school-age children.
- Recycled, donated or repurposed materials will be checked before use and excluded where their previous use or condition creates an unacceptable risk.
- Manufacturer instructions and relevant Australian/New Zealand Standards will be considered for installation, use, inspection and maintenance where applicable.
- Children may contribute to caring for equipment and environments, but maintenance tasks involving hazardous tools, chemicals, electrical work or other unsafe exposure remain adult responsibilities.

PLAYGROUND EQUIPMENT, SURFACES AND GROUNDS

- Fixed and moveable play equipment will be inspected and maintained with regard to its condition, installation, foreseeable use and relevant standards.
- Impact-absorbing/soft-fall surfaces will be maintained at appropriate depth, coverage and condition for the equipment and fall height where required.
- Grounds will be monitored for holes, exposed roots, broken branches, damaged surfaces, sharp objects, animal waste, hazardous plants, pooled water and other environmental hazards.
- Trees or vegetation presenting a foreseeable risk will be assessed and managed by an appropriately competent person where necessary.
- Natural environments and adventurous play opportunities will not be removed merely because they contain manageable risk; benefits and hazards will be considered and proportionate controls applied.

ELECTRICAL, PLANT AND OTHER EQUIPMENT

- Electrical equipment, leads, plugs, power boards and appliances will be maintained in safe working condition and removed from use where damaged.
- Inspection, testing and tagging will be undertaken where required by applicable WHS duties, the work environment, manufacturer guidance or risk assessment; the policy does not impose blanket testing and tagging where it is not legally required.
- Power boards will not be overloaded or daisy-chained and electrical equipment will be positioned to minimise access, trip, liquid and heat risks.
- Specialist plant or equipment will only be repaired or serviced by a competent and, where required, licensed person.

HAZARDOUS PRODUCTS AND MAINTENANCE WORK

- Cleaning chemicals, paints, solvents, fuels, pesticides, tools and other hazardous maintenance products will be stored and used in accordance with the service's Dangerous Products Policy and applicable SDS/label requirements.
- Maintenance work that creates dust, fumes, noise, sharp debris, hot work, electrical exposure or other hazards will be separated from children and scheduled outside care hours where reasonably practicable.
- Contractors will not be left to work in child-accessible areas without appropriate controls, supervision arrangements and service/site authorisation.

INCLUSION, ACCESS AND SUPERVISION

- Maintenance and environmental changes will consider access and participation for children with disability or additional needs and reasonable adjustments where required.
- Furniture, equipment or temporary works must not create blind spots or compromise educators' ability to adequately supervise children.
- Regulation 115 requirements concerning premises designed to facilitate supervision will be considered when planning alterations or managing design limitations.

URGENT HAZARDS, CLOSURE AND NOTIFICATIONS

- If an area cannot be made safe, it will be closed to children until the risk is controlled.
- If the service premises, or sufficient approved areas, cannot be safely used, management will determine whether the session can operate safely, relocate in accordance with approvals, or must close.
- Families and the school/site controller will be informed as appropriate.
- The Regulatory Authority will be notified where a maintenance issue, incident, change to premises or closure meets a statutory notification requirement. Internal maintenance processes must not delay a required notification.
- If a maintenance-related incident causes injury, trauma or illness, the Incident, Injury, Trauma and Illness Policy and relevant emergency procedures will also apply.

CONTINUOUS IMPROVEMENT

Maintenance trends, repeated hazards, incidents, near misses, child and family feedback, audit findings and changes to legislation or the premises will be reviewed to improve preventive maintenance and environmental safety. Children will be involved in age-appropriate discussions about the safety and usability of spaces that affect them.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including the NSW paramountcy provisions and sections 165 and 167 as applicable.
- Education and Care Services National Regulations, including regulations 103 (safe, clean and good repair), 104 (fencing), 105 (furniture, materials and equipment), 106 (laundry and hygiene), 107–110 (space, facilities, ventilation and natural light), 113–115 (outdoor environment, shade and supervision design), 117 (glass) and 168 as applicable.
- National Quality Standard – Standard 2.2 Safety; Standard 3.1 Design, including Elements 3.1.1 Fit for purpose and 3.1.2 Upkeep; and Standard 3.2 Use.
- Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2025, as applicable.

- Building Code of Australia/National Construction Code, relevant Australian Standards and local/site requirements where applicable.

SOURCES

- ACECQA – Quality Area 3: Physical environment and Guide to the National Quality Framework, current 2026 guidance.
- NSW Early Learning Commission / NSW Department of Education – child safety reforms and paramountcy guidance, 2026.
- SafeWork NSW – current work health and safety guidance.
- My Time, Our Place – Framework for School Age Care in Australia V2.0.
- Kidsafe NSW/Australia guidance, where relevant to playground and environmental safety.

3.03 Pest Control Policy

INTRODUCTION

Cubby OOSH is committed to maintaining clean, safe and well-maintained indoor and outdoor environments that minimise pests and vermin without unnecessarily exposing children, educators or others to pesticides or hazardous chemicals. Pest management will focus first on prevention, hygiene, exclusion and other non-chemical controls, with chemical treatment used only when reasonably necessary and in accordance with product directions, workplace safety requirements and professional advice.

PURPOSE

To provide a practical and risk-based approach to preventing, identifying and managing pests and vermin at Cubby OOSH services, including services operating on shared school sites, while protecting children from harm and hazards and maintaining hygienic premises.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisor, Responsible Persons, educators, staff, students, volunteers, contractors, children and families. It applies to all indoor and outdoor areas used by the service, including kitchens and food areas, storage, waste areas, gardens, play spaces and shared school premises.

CHILD SAFETY AND PARAMOUNTCY

Because pest-control decisions can directly affect children's health and safety, the safety, rights and best interests of children will be the paramount consideration when deciding whether, when and how pest-control measures are used. Where a treatment method, timing or operational preference conflicts with children's safety or best interests, the safer option for children will prevail.

PREVENTION AND DAILY PRACTICE

- Food will be stored in suitable sealed containers and food preparation, eating and storage areas will be cleaned after use.
- Waste and food scraps will be removed regularly and bins will be kept closed, clean and positioned to minimise pest access.
- The service will avoid unnecessary accumulation of cardboard, rubbish, standing water, food residue and clutter that may harbour pests.
- Indoor and outdoor areas will be observed for signs of pests, including droppings, nests, gnawing, tracks, insect activity, damaged food packaging or other evidence.
- Potential entry points, leaks, damaged screens, gaps or other building maintenance issues contributing to pest access will be reported and addressed under the Maintenance of Buildings, Grounds & Equipment Policy.
- Where Cubby OOSH operates on a school site, pest concerns affecting school-owned or shared areas will be reported promptly to the school/site controller and interim service controls implemented where required.

PEST MANAGEMENT HIERARCHY

When pests or vermin are identified, the service will use the least hazardous reasonably effective control method, considering the nature and extent of the problem.

- Identify the pest and the likely source or cause.
- Improve cleaning, waste management, food storage, drainage, maintenance or exclusion measures where relevant.
- Use physical or non-chemical controls where safe and suitable, such as sealing access points, traps or removal by a competent person.
- Where chemical treatment is reasonably necessary, select an appropriately authorised product and use it strictly in accordance with its label, Safety Data Sheet (SDS) where applicable, manufacturer directions and any professional pest-controller instructions.
- Use a licensed or appropriately qualified pest-management contractor where the infestation, product, treatment method or risk requires specialist expertise.

USE OF PESTICIDES, BAITS AND CHEMICAL PRODUCTS

- Pesticides, insecticides, rodenticides, snail/slug baits and similar products must be inaccessible to children at all times.
- Chemical treatment will preferably be undertaken when children are not present. Areas will not be returned to use until any required re-entry period has passed and the area is safe, adequately ventilated and free of accessible residues, baits, containers or contaminated materials.
- Products will not be decanted into food or drink containers and will remain correctly labelled.
- Current SDS will be obtained and made accessible where required under workplace hazardous-chemical requirements, and hazardous chemicals will be included in the workplace register where legally required.
- The service will follow the product label for dilution, application, ventilation, personal protective equipment, storage, disposal and re-entry requirements rather than applying a blanket rule that all products are safe after a fixed period.
- Baits and traps will be positioned so children cannot access, handle or interfere with them. Their location will be known to relevant staff and checked as appropriate.
- A chemical must never be applied near exposed food, utensils, children's drink bottles, toys or resources unless these have been removed or adequately protected and the area is cleaned as required before reuse.

PEST CONTROL DURING OPERATING HOURS

Routine pesticide application should not occur while children are present. If an urgent pest issue arises during operating hours, children will be kept away from the affected area and a risk assessment will determine whether the area can remain closed, whether activities should be relocated, or whether further action is required. Emergency or urgent action will follow product safety information and professional advice.

NOTIFICATION AND RECORDS

- Families will be informed where a pest-control treatment is relevant to children’s attendance, access, health or safety, including any restrictions or precautions they need to know.
- Where treatment occurs on a shared school site, the service will coordinate with the school/site controller so relevant treatment information, timing and access restrictions are known.
- The service will retain appropriate records of significant pest issues and treatments, including the date, location, pest identified, control method, product or contractor used, restrictions/re-entry information and follow-up action.

- Any exposure, illness, injury or other incident involving a pest-control product will be managed under the service's Incident, Injury, Trauma and Illness, First Aid and Medical Conditions procedures and notified as required.

SNAILS, SLUGS AND RAT LUNGWORM

Rat lungworm disease is a very rare but potentially serious illness associated with ingesting infected snails or slugs. Children will be discouraged from handling or eating snails and slugs. After handling snails, slugs or gardening materials, hands should be washed thoroughly. Fresh produce will be washed before eating.

- If a child is witnessed eating or swallowing any part of a snail or slug, educators will provide first aid as required, contact the family promptly and seek immediate medical/Poison Information Centre advice. Current NSW guidance indicates preventive prescription treatment may be considered when ingestion occurred within the previous 7 days.
- Snail pellets and rodent baits can themselves present a poisoning hazard and must be kept completely inaccessible to children.

OTHER PESTS AND VERMIN

- Rodents: contaminated food or materials will be discarded safely; droppings and affected areas will be cleaned using appropriate hygiene and PPE precautions rather than allowing children to assist.
- Wasps, bees or biting/stinging insects: educators will restrict access to nests or concentrated activity and arrange safe removal where necessary, taking account of children with known allergies or anaphylaxis.
- Mosquitoes and flies: standing water, food waste and other breeding/attraction sources will be minimised and physical barriers or other low-risk controls used where practical.
- Ticks, fleas and other pests: the response will be based on the identified pest, exposure risk and current health or professional advice.

RESPONSIBILITIES

- The Approved Provider will ensure pest management arrangements comply with the National Law and Regulations, WHS duties and relevant NSW requirements.
- The Nominated Supervisor/Responsible Person will ensure pest concerns are acted upon promptly, treatment risks are controlled and required information is communicated.
- Educators and staff will maintain hygienic practices, report pest evidence promptly, prevent children accessing pests, baits or chemicals and follow any treatment restrictions.
- Contractors must provide relevant treatment information and comply with applicable licensing, label, SDS, site and safety requirements.

CONTINUOUS IMPROVEMENT

Recurring pest activity will trigger review of contributing factors such as food storage, waste, drainage, vegetation, building defects, cleaning arrangements and shared-site conditions. The service will review controls following significant infestations, chemical exposures, incidents, complaints or changes to legislation or authoritative guidance.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including section 167 and current NSW paramountcy requirements where decisions affect children.

- Education and Care Services National Regulations, including regulation 77 (health, hygiene and safe food practices), regulation 103 (premises, furniture and equipment safe, clean and in good repair) and regulation 168 as applicable.
- National Quality Standard - Quality Area 2 Children's Health and Safety and Quality Area 3 Physical Environment, including Element 3.1.2 Upkeep.
- Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2025, including applicable hazardous-chemical duties.
- Pesticides Act 1999 (NSW) and Pesticides Regulation 2017, as applicable to the pesticide use or contractor.

SOURCES

- ACECQA - Quality Area 3: Physical Environment and current Guide to the National Quality Framework.
- SafeWork NSW - Hazardous chemicals: general requirements, labelling and Safety Data Sheets.
- NSW Health - Rat lung worm disease fact sheet.
- Sydney Children's Hospitals Network - Snail and Slug Ingestion guideline.
- My Time, Our Place - Framework for School Age Care in Australia V2.0.

3.04 Electrical Equipment Safety, Inspection & Tagging Policy

INTRODUCTION

Electrical equipment can create risks including electric shock, burns, fire and injury if it is damaged, unsuitable, incorrectly used or inadequately maintained. Cubby OOSH will manage electrical risks through safe purchasing and use, routine visual inspection, prompt removal of unsafe equipment, appropriate residual current device (RCD) protection and inspection/testing where required by NSW work health and safety legislation.

PURPOSE

To ensure electrical equipment used at Cubby OOSH services is safe, fit for purpose and appropriately inspected, maintained, tested and recorded, while meeting the Education and Care Services National Law and Regulations and NSW work health and safety requirements.

SCOPE

This policy applies to electrical equipment used by Cubby OOSH, including service-owned, school-owned and approved borrowed equipment used in OOSH areas. It applies to the Approved Provider, Nominated Supervisor, Responsible Persons, educators, staff, contractors, students and volunteers.

CHILD SAFETY

Electrical safety decisions that affect children will prioritise their safety and best interests. Equipment presenting an electrical risk will be made inaccessible to children and removed from use until it is confirmed safe. Children will be supported to use age-appropriate electrical or electronic equipment safely where permitted and supervised, rather than relying on blanket restrictions that are unnecessary for school-age children.

INSPECTION, TESTING AND TAGGING

NSW WHS requirements do not impose a blanket legal requirement for every electrical appliance in every workplace to be tested and tagged every 12 months. The requirement depends on the equipment and the environment in which it is used.

- Electrical equipment supplied through a socket outlet and used in an operating environment where normal use exposes it to conditions likely to cause damage or reduce its expected life must be regularly inspected and tested by a competent person in accordance with the Work Health and Safety Regulation 2025.
- Examples of conditions that may make an environment hostile include exposure to moisture, heat, vibration, mechanical damage, chemicals or dust, or circumstances where equipment or flexible cords are frequently moved and damage is reasonably likely.
- Equipment not subject to mandatory testing will still be visually inspected and maintained according to risk, manufacturer instructions and service/site requirements.
- Cubby OOSH may adopt scheduled testing and tagging more broadly as an organisational or school-site safety control where this is considered appropriate, but such a schedule will not be represented as a universal annual statutory requirement.

- Testing required by the WHS Regulation must be completed by a competent person with the knowledge, skills and appropriate testing equipment. A competent tester does not necessarily have to be a licensed electrician solely to perform in-service inspection and testing; electrical repair or electrical installation work must be undertaken by a person appropriately licensed or authorised for that work.

TESTING RECORDS

- Where testing is required under the WHS Regulation, the record must identify the person who carried out the testing, the date of testing, the outcome and the date the next test is due.
- The record may be a tag attached to the equipment or another suitable record such as a register or database.
- Required testing records will be retained until the equipment is next tested or permanently removed from the workplace or disposed of.
- Equipment that is required to be tested must not be used if the required testing has not occurred.

DAILY AND PRE-USE VISUAL CHECKS

- Educators and staff will visually check electrical equipment before or during use for obvious damage, including frayed or crushed cords, exposed wires, cracked plugs, loose connections, scorch marks, damaged casings, overheating or evidence of liquid exposure.
- Relevant electrical hazards identified during service safety checks will be recorded on the Centre's Daily Checklist or maintenance system.
- Any item suspected of being unsafe will be switched off where safe to do so, disconnected if this can be done safely, clearly identified as not for use and placed where children and staff cannot inadvertently use it.
- Faults will be reported promptly to the Nominated Supervisor/Responsible Person and managed through the Maintenance of Buildings, Grounds & Equipment Policy.

SAFE USE OF ELECTRICAL EQUIPMENT

- Electrical equipment will be used for its intended purpose and in accordance with manufacturer instructions.
- Power boards will not be overloaded or connected to other power boards ('daisy chained'). Double adaptors will be avoided where safer alternatives are available.
- Cords and leads will be positioned to minimise trip, crushing, cutting, water and heat hazards and will not obstruct exits or supervision pathways.
- Electrical equipment will not be used with wet hands or in wet areas unless it is designed and protected for that use.
- Portable heaters, cooking appliances and other heat-producing electrical equipment will be positioned and supervised to prevent burns, fire and unauthorised child access.
- Chargers, batteries and rechargeable devices will be monitored for damage, swelling, excessive heat or other signs of failure and removed from use if unsafe.
- Equipment will be switched off when appropriate after use. Unplugging and locked storage are risk-based controls and are not required for every cord or appliance merely because it is not in use.

POWER POINTS AND CHILD ACCESS

Power points, plugs and electrical installations must be maintained in safe condition. The service will use risk-based controls appropriate to school-age children and the environment. Blanket use of plastic outlet

covers is not relied upon as the primary electrical safety control. Damaged, loose, exposed or otherwise unsafe outlets must be isolated from children and reported for repair.

RCDs / SAFETY SWITCHES

- RCD protection will be provided and maintained where required by the WHS Regulation and applicable electrical installation requirements.
- Where plug-in electrical equipment is used in a hostile operating environment, RCD requirements under the WHS Regulation will be followed.
- RCD inspection and testing will be undertaken at the intervals and in the manner required for the installation, equipment and operating environment.

FAULTS, REPAIRS AND ELECTRICAL WORK

- Faulty equipment will not be returned to service until repaired and confirmed safe, or it will be replaced/disposed of.
- Staff and educators must not undertake electrical repairs unless they are appropriately licensed or otherwise legally authorised and competent to perform that work.
- Electrical work will be de-energised before work begins except in the limited circumstances permitted by NSW electrical safety law.
- Where work is being undertaken on school-owned electrical infrastructure, Cubby OOSH will coordinate with the school/site controller and implement interim controls for OOSH children and staff.

PURCHASING AND INTRODUCING EQUIPMENT

- New or donated electrical equipment will be checked for condition, suitability, instructions and any required compliance marking before use.
- Second-hand electrical equipment will not be used where its condition, history or safety cannot be reasonably established.
- Personal electrical equipment brought by staff or others may only be used where authorised by the service and subject to the same safety requirements as service equipment.

INCIDENTS AND EMERGENCIES

- In an electrical emergency, educators will not touch a person who remains in contact with an electrical source. Power will be isolated first if this can be done safely and 000 contacted where required.
- First aid, CPR and emergency procedures will be followed by appropriately trained staff.
- Electrical shocks, burns, fires, equipment failures and near misses will be reported, documented and reviewed, with Regulatory Authority and SafeWork NSW notifications made where statutory thresholds are met.

RESPONSIBILITIES

- The Approved Provider will ensure systems are in place to manage electrical risks, maintain premises/equipment and meet applicable WHS and education and care requirements.
- The Nominated Supervisor/Responsible Person will ensure hazards are controlled, unsafe equipment is removed, required testing is current and records are available.
- Educators and staff will use equipment safely, conduct reasonable visual checks, report defects and prevent use of equipment known or suspected to be unsafe.
- Competent testers and licensed electrical contractors will perform work within their competency and legal authority and provide required records.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including section 167 - protection of children from harm and hazards.
- Education and Care Services National Regulations, including regulation 103 - premises, furniture and equipment to be safe, clean and in good repair; and regulation 105 - furniture, materials and equipment.
- National Quality Standard - Quality Area 2, Standard 2.2 Safety; and Quality Area 3, including Element 3.1.2 Upkeep.
- Work Health and Safety Act 2011 (NSW).
- Work Health and Safety Regulation 2025 (NSW), including current electrical risk, inspection/testing, record and RCD requirements.
- AS/NZS 3760 - In-service safety inspection and testing of electrical equipment and RCDs, where applicable.

SOURCES

- SafeWork NSW - Electrical work and Electrical risks at the workplace guidance.
- SafeWork NSW - Work Health and Safety Regulation 2025 information.
- ACECQA - Quality Area 3: Physical Environment and Element 3.1.2 Upkeep.
- My Time, Our Place - Framework for School Age Care in Australia V2.0.

3.05 Environmental Sustainability Policy

INTRODUCTION

Cubby OOSH recognises sustainability as an important part of quality school-age care. Sustainability includes environmental, social and economic dimensions and the relationships between people, communities, living things, land, water and resources. Through everyday OOSH operations, play and leisure experiences, children and young people can explore these connections, contribute ideas and take meaningful action in ways that are relevant to their interests, service and local community.

PURPOSE

To embed environmentally responsible practices across Cubby OOSH operations and programs and to support children and young people to develop knowledge, values, agency and practical skills that contribute to sustainable communities.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisor, Responsible Persons, Educational Leaders, educators, staff, students, volunteers, children, families and contractors. It applies across before-school care, after-school care, vacation care, excursions and shared school-site environments.

GUIDING PRINCIPLES

- Sustainability will be embedded in everyday service practice rather than limited to occasional themed activities.
- Children and young people will be treated as capable partners and collaborators who can contribute ideas, make choices, investigate issues and participate in sustainable action.
- Sustainable practice will reflect the OOSH context and children's right to play, leisure, choice and participation; children will not be required to participate in environmental projects as a condition of accessing other leisure experiences.
- Environmental responsibility will be balanced with health, hygiene, food safety, inclusion, accessibility and child safety requirements.
- Practices will be critically reflected upon so that a practice is not described as sustainable merely because it involves recycling or natural materials; the service will consider environmental, social and economic impacts and whether the practice is meaningful in its context.

MY TIME, OUR PLACE V2.0

Cubby OOSH will use My Time, Our Place: Framework for School Age Care in Australia V2.0 (MTOP V2.0) to inform sustainability practice. MTOP V2.0 identifies Sustainability as a Principle and recognises environmental, social and economic sustainability as interconnected. Sustainability may be reflected across the program, relationships, service philosophy, environments, community partnerships and children's participation.

CHILDREN'S VOICE, AGENCY AND PARTICIPATION

- Educators will seek children's ideas about the environment, use of resources and sustainability priorities at the service.
- Children may contribute to decisions such as garden projects, recycling systems, reuse of resources, waste reduction, energy or water-saving ideas and care of natural spaces.

- Educators will support inquiry rather than prescribing a single 'correct' environmental view, encouraging children to ask questions, research information, consider different perspectives and propose solutions.
- Children's contributions may be captured through conversations, meetings, suggestion systems, drawings, surveys, projects, photographs, program reflections or other age-appropriate methods.
- Children will not be shamed for food waste, resource use or family lifestyle choices. Sustainability education will be respectful, strengths-based and culturally responsive.

NATURAL ENVIRONMENTS AND CONNECTION WITH NATURE

- Where available and safe, children will have opportunities to interact with natural environments, vegetation, loose natural materials and local biodiversity.
- Experiences may include gardening, nature observation, outdoor play, nature-based art, caring for plants, investigating insects and animals, or contributing to improvements to OOSH spaces.
- Natural and recycled materials will be checked for hazards, cleanliness and suitability before use. Sustainability does not override requirements to protect children from harm and hazards.
- The service will consider local climate, water availability, biodiversity and site conditions when selecting plants or planning environmental projects.
- The perspectives of Aboriginal and Torres Strait Islander peoples, including connections to Country/Place and caring for land and waters, may be explored respectfully and, where possible, with guidance from local Aboriginal community knowledge and relationships rather than tokenistic activities.

REUSE, RECYCLING AND WASTE

- The service will follow available local waste and recycling systems and clearly identify bins or collection points where practical.
- Children may participate in designing or improving waste and recycling systems and in investigating what can actually be recycled locally.
- Reusable options will be considered where they are hygienic, safe, practical and fit for purpose.
- Clean recycled and repurposed materials may be used for play, construction, art and projects after being checked for sharp edges, contamination, allergens, previous hazardous contents and other foreseeable risks.
- Food waste may be reduced through appropriate portioning, children's choice and feedback, safe storage and service planning. Children will not be pressured to eat food in order to reduce waste.
- Composting or worm farming may be used where suitable controls are in place for hygiene, pests, allergens and safe child participation.

ENERGY AND RESOURCE CONSERVATION

- Lights, heating, cooling, appliances and equipment will be used efficiently while maintaining children's comfort, safety, supervision and access.
- Energy-efficient equipment and lighting will be considered when items are purchased or replaced, taking account of suitability, whole-of-life cost and service needs.
- Doors, windows, blinds, shade and natural ventilation may be used to support comfortable temperatures where safe and appropriate.
- Printing and paper use will be minimised where practical, with digital communication or double-sided/recycled paper considered when appropriate.
- The service will avoid claims that one appliance or method is always more sustainable; decisions will consider current equipment efficiency, safety, task requirements and local circumstances.

WATER CONSERVATION AND WATER QUALITY

- Children and educators will be encouraged to use water thoughtfully while maintaining hygiene, cleaning, hydration and food-safety requirements.
- Leaking taps, toilets or plumbing will be reported promptly through maintenance systems.
- Water-play experiences may incorporate water conservation through considered quantities, reuse for gardens where hygienically appropriate, and children's involvement in planning.
- Paints, oils, fats, chemicals and other pollutants will not be disposed of into stormwater or drains contrary to product instructions or local waste requirements.
- Water-saving equipment or practices may be introduced where suitable for the service and school site.

FOOD, GARDENS AND BIODIVERSITY

- Gardening and food-growing experiences may support children's understanding of seasons, biodiversity, food systems and caring for living things.
- Plants will be selected and maintained with consideration of toxicity, allergies, thorns, pest attraction and other foreseeable hazards.
- Produce grown at the service will be handled, washed, prepared and served in accordance with applicable food-safety and hygiene requirements.
- The service may explore locally relevant environmental issues such as native plants, pollinators, habitat, litter, water use and waste in ways appropriate to children's interests and the service context.

PURCHASING AND CONSUMPTION

- Purchasing decisions may consider durability, repairability, reusability, packaging, energy efficiency, responsible sourcing, cost over the useful life of the item and whether an existing resource can safely meet the need.
- The service will avoid unnecessary purchasing solely for one-off sustainability activities and will favour meaningful use of existing resources where appropriate.
- Donated or second-hand resources will be accepted only when they are safe, clean, suitable and compliant with service requirements.

FAMILIES, SCHOOL AND COMMUNITY PARTNERSHIPS

- Families may contribute ideas, knowledge, clean reusable resources or participation in sustainability initiatives where appropriate.
- Where Cubby OOSH operates on a school site, the service will work with the school/site controller on shared waste, energy, water, garden or environmental initiatives where practical.
- Local councils, community organisations, environmental groups and other suitable services may be used as sources of current information or partnership opportunities.
- Community partnerships will be selected for relevance and benefit rather than commercial promotion.

EDUCATOR PRACTICE AND PROFESSIONAL LEARNING

- Educators will model environmentally responsible practices in genuine, achievable ways.
- The Educational Leader and service leadership will support critical reflection about sustainability and how it connects with MTOP V2.0, the service philosophy and children's interests.
- Professional learning and reliable resources will be made available where educators need further knowledge about sustainability or environmental practice.

- Educators will avoid presenting outdated environmental claims as fact and will use credible, current sources for environmental information explored with children.

SAFETY, HEALTH AND PARAMOUNTCY WHERE RELEVANT

Sustainability initiatives must not compromise children's safety, rights or best interests. Where an environmental practice or sustainability objective creates a conflict with a child's health, safety, inclusion, dignity or other best interests, the child's safety, rights and best interests will be the paramount consideration. This includes decisions involving recycled materials, gardening, animals, food, chemicals, water use, heat, air quality and outdoor environments.

SUSTAINABILITY PLAN AND CONTINUOUS IMPROVEMENT

- The Cubby OOSH Sustainability Plan may identify practical goals, actions, responsibilities and review points relevant to each service.
- Goals will be realistic for the service's location, school-site arrangements, available infrastructure and community.
- Progress may be reviewed using children's feedback, educator reflection, family input, service data or observations such as waste, resource use and participation.
- The policy and Sustainability Plan will be reviewed when practices, legislation, NQF guidance, service circumstances or significant environmental issues change.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including the requirement for an educational program based on an approved learning framework and protection of children from harm and hazards.
- Education and Care Services National Regulations, including regulation 73 - educational program; regulation 103 - premises, furniture and equipment to be safe, clean and in good repair; and other relevant premises, health and safety requirements.
- National Quality Standard - Quality Area 1 Educational Program and Practice; Quality Area 3 Physical Environment, particularly Standard 3.2 and Element 3.2.3 Environmentally responsible; and Quality Area 7 where sustainability is embedded in service philosophy and governance.
- My Time, Our Place: Framework for School Age Care in Australia V2.0 - Principle: Sustainability and relevant practices/outcomes.
- Relevant NSW environmental, waste, water, WHS and local council requirements as applicable to a particular service or activity.

SOURCES

- ACECQA - Guide to the National Quality Framework, current 2026 edition.
- ACECQA - Element 3.2.3: Environmentally responsible.
- ACECQA - Information Sheet: MTOP Principles - Sustainability.
- ACECQA - My Time, Our Place: Framework for School Age Care in Australia V2.0.
- Relevant local council waste and recycling guidance for each service location.

CUBBYOOSH

ACTIVE & ENGAGING OUT OF SCHOOL HOURS CARE

Quality Area 4

CUBBY OOSH QUALITY AREA 4 POLICY UPDATE REGISTER

OOSH and Long Day Care Summary of revised policy content: October 2026

Policy No.	Policy Name	Key changes made in October 2026	Area of change	Last Revised	Next Review
4.01	Code of Conduct Policy	Child-safe conduct and paramountcy; professional boundaries; reporting and speaking up; devices, images, confidentiality and respectful workplace expectations.	Scope And Service Differences; Paramount Consideration And Child Safe Conduct; Respectful Workplace And Professionalism	Oct 2026	Oct 2027
4.02	Responsible Person Policy	Responsible Person eligibility, written consent, appointment and handover; continuous coverage, display and record requirements; OOSH and LDC application.	Scope And Service Differences; Paramount Consideration; Who May Be The Responsible Person	Oct 2026	Oct 2027
4.03	Educational Leader Policy	Educational Leader designation and support; MTOP V2.0 for OOSH and EYLF V2.0 for LDC; mentoring, reflection, planning and child-safe leadership.	Scope And Learning Frameworks; Designation And Support; Paramount Consideration And Child Safe Educational Leadership	Oct 2026	Oct 2027
4.04	Team Member Induction Policy	Child-safe recruitment-to-induction process; screening, mandatory training, supervision, role-specific orientation and induction records.	Paramount Consideration And Child Safe Induction; Implementation; Responsibilities	Oct 2026	Oct 2027

4.05	Educator Roster & Routines Policy	Safe rosters, staffing ratios and supervision; educator breaks, handovers, short-notice absences, cross-service relief and daily routines.	Paramount Consideration And Safe Staffing; Roster Planning And Continuity; Daily Routines And Educational Program	Oct 2026	Oct 2027
4.06	Learning & Development Policy	Professional learning plans, child protection training, paid training obligations, mentoring, records and evaluation of development.	Child Safety And Paramountcy; Professional Learning Priorities; Training Plan And Access	Oct 2026	Oct 2027
4.07	Team Member Interaction Policy	Respectful team communication; professional boundaries, conflict resolution, confidential information, digital communications and speaking up.	Child Safety And Paramountcy; Implementation — Respectful Professional Relationships; Information Sharing And Confidentiality	Oct 2026	Oct 2027
4.08	New Team Member Selection Policy	Child-safe selection; structured interviews, referee checks, WWCC and suitability verification, fair hiring, role qualifications and ongoing monitoring.	Child Safe Commitment And Paramountcy; Purpose And Scope; Position Planning And Advertising	Oct 2026	Oct 2027
4.09	Uniform & Personal Appearance Policy	Practical uniform and footwear rules; hygiene, sun safety, hair, jewellery, tattoos and piercings; fair adjustments and lawful deductions.	Child Safety And Paramountcy; Uniform And Identification; Trousers, Shorts And Active Clothing	Oct 2026	Oct 2027
4.10	Smoke-Free and Vape-Free Environment Policy	Smoke- and vape-free premises, vehicles and excursions; staff breaks, supervision, hygiene, visitors and accidental nicotine exposure.	Child Safety And Paramountcy; Implementation	Oct 2026	Oct 2027

4.11	Drug, Alcohol & Substance Impairment Policy	Fitness for work and suspected impairment; prescription medicine privacy, fair investigation/testing, child safety, family and visitor risks.	Paramount Consideration And Legal Requirements; Substance-Free Environment; Fitness For Work And Medication	Oct 2026	Oct 2027
4.12	Confidentiality of Records Policy	Privacy and confidential records; secure OWNA/digital access, photographs, information sharing for child protection, retention and breaches.	Paramount Consideration And Safeguarding; Collection And Privacy Notices; Access, Use And Disclosure	Oct 2026	Oct 2027
4.13	Social Media Policy	Approved social media accounts and consent; service devices and children's images; online safety, personal posting, family photography and breaches.	Paramount Consideration And Child Safe Online Practice; Official Cubby Social Media Accounts; Personal Social Media And Professional Boundaries	Oct 2026	Oct 2027
4.14	Work Health & Safety Policy	NSW WHS duties; hazard/risk management, psychosocial safety, emergency reporting, safe supervision, chemicals and injury management.	Responsibilities And Consultation; Paramountcy And Safe Service Operation; Induction, Training And Communication	Oct 2026	Oct 2027
4.15	Educators Lifting & Bending Policy	Manual handling and safe assistance to children; lifting, bending, equipment use, hazard controls, training and injury reporting.	Child Safety And Paramountcy; Implementation — Risk Management; Safe Lifting And Moving Of Equipment	Oct 2026	Oct 2027
4.16	Educator Review & Appraisal Policy	Annual appraisals and development check-ins; feedback, goals, mentoring, fair performance improvement, wellbeing and confidentiality.	Principles; Review Cycle And Preparation; Appraisal Discussion	Oct 2026	Oct 2027

4.17	Store Room & Team Lounge Guidelines	Safe storerooms and team lounges; restricted child access, storage, manual handling, hygiene, maintenance and breaks without supervision gaps.	Child Safety And Access; Resource Cupboards And Store Rooms; Team Lounge And Staff Break Areas	Oct 2026	Oct 2027
4.18	Team Member Complaints & Grievance Procedures	Accessible grievance process; bullying and harassment, procedural fairness, confidentiality, support persons, external reporting and child-safety escalation.	Principles; Child Safety And Paramountcy; Definitions	Oct 2026	Oct 2027
4.19	Participation of Volunteers & Students Policy	Student and volunteer screening, WWCC, induction, supervision and device rules; mentoring, placement records and ratio safeguards.	Purpose And Scope; Paramount Consideration And Child Safety; Screening And Approval Before Commencement	Oct 2026	Oct 2027
4.20	Team Member Immunisation Policy	Current immunisation recommendations; privacy of vaccination records, exposure management, infection prevention and fair adjustments.	Immunisation Recommendations; Immunisation Status, Consent And Privacy; Infection Prevention And Exposure Management	Oct 2026	Oct 2027
4.21	Disciplinary Action Policy	Progressive and proportionate discipline; warnings and improvement plans, serious misconduct, investigations, fair process and statutory reporting.	Child Safety And Paramountcy; Guiding Principles; Early Support And Informal Feedback	Oct 2026	Oct 2027
4.22	Publicity & Media Policy	Authorised media spokespersons; crisis communications, child-safety reporting, consent and publicity, photographs, confidentiality and social media.	Paramount Consideration And Child Safety; Media Enquiries And Authorised Spokespersons; Critical Incidents And Statutory Reporting	Oct 2026	Oct 2027

4.23	Pregnancy Policy	Pregnancy WHS and infection risks; manual handling, safe jobs, parental leave, flexible return to work and non-discrimination.	Support, Privacy And Non-Discrimination; Pregnancy-Related Work Health And Safety; Paramount Consideration For Children	Oct 2026	Oct 2027
4.24	Traineeship Policy	Training contracts and RTO responsibilities; paid study time, mentoring, trainee supervision/ratios, progress and completion records.	Child Safety And Supervision; Approval And Training Contract; Paid Training Time And Workplace Support	Oct 2026	Oct 2027
4.25	Time Off in Lieu (TOIL) Policy	TOIL subject to award/agreement; written approvals, overtime rates, staff meetings, payroll records, payout and safe roster coverage.	Definitions; Implementation – Approval And Agreement; Recording And Payroll	Oct 2026	Oct 2027
4.26	Leave Policy	Annual, personal, compassionate, parental and long service leave; 10 days paid family/domestic violence leave, public holidays and school holiday arrangements.	Purpose And Scope; General Leave Procedures; Annual Leave	Oct 2026	Oct 2027
4.27	PROTECTED DISCLOSURES (WHISTLEBLOWER) POLICY	Protected disclosures, internal/external reporting, child safety and paramountcy, confidentiality, anti-retaliation, impartial investigations and procedural fairness.	4.27 Protected Disclosures (Whistleblower) Policy; Purpose And Paramountcy; What Can Be Reported	Oct 2026	Oct 2027

4.01 Code of Conduct Policy

INTRODUCTION

Cubby OOSH is committed to an inclusive, respectful and child safe workplace. Integrity, accountability, fairness, professional boundaries and respectful relationships guide the conduct of all employees, management, volunteers and students.

PURPOSE

This Code establishes clear, practical standards of professional and ethical conduct across Cubby OOSH services, with a primary focus on before school care, after school care and vacation care. It supports safe relationships, appropriate supervision, workplace respect and timely reporting of concerns.

SCOPE AND SERVICE DIFFERENCES

This policy applies to the Approved Provider, persons with management or control, Nominated Supervisors, Responsible Persons, Educational Leaders, educators, other staff, volunteers, contractors and students as relevant. Cubby also operates two long day care services: the same core child safety, ethical conduct, device and reporting expectations apply to those centre-based services.

OOSH educational practice is guided by My Time, Our Place V2.0; long day care educational practice is guided by Belonging, Being & Becoming: The Early Years Learning Framework V2.0. Each service must separately meet the applicable staffing qualifications, educator-to-child ratios, supervision, sleep/rest, age-appropriate practice and other service-specific requirements. This Code does not replace those operational policies.

PARAMOUNT CONSIDERATION AND CHILD SAFE CONDUCT

The safety, rights and best interests of children must be the paramount consideration in decisions and actions relating to their education and care. Staff must not allow convenience, financial considerations, reputational concerns, personal relationships or instructions from others to override child safety.

- Treat every child with dignity, fairness and respect; listen to their views and support participation and agency appropriate to their age and development.
- Maintain professional boundaries; never use corporal punishment, humiliation, threats, ridicule, intimidation, discrimination, sexualised conduct or degrading treatment.
- Use positive, trauma-informed and developmentally appropriate guidance and co-regulation; seek assistance when behaviour or supervision risks increase.
- Maintain adequate supervision, accurate attendance and safe transitions; promptly respond to missing or unaccounted-for children and emergencies.
- Never leave a child in an unsafe situation, conceal a child safety concern or discourage a child or colleague from speaking up.

RESPECTFUL WORKPLACE AND PROFESSIONALISM

- Communicate respectfully with children, families, colleagues, school staff, visitors and management, including during disagreement.
- Bullying, harassment, victimisation, discrimination, threats, gossip intended to harm, abusive language and retaliation for reporting concerns are not acceptable.

- Follow lawful and reasonable directions, service policies, approved procedures and professional standards; seek clarification and raise concerns about unsafe or unlawful directions.
- Attend work fit for duty and on time; perform assigned responsibilities, actively engage with children and contribute to the program, routines, safety checks and teamwork.
- Respect cultural identities, disability, gender, family structure, language, religion and differing abilities; support equitable participation and reasonable adjustments.
- Maintain appropriate confidentiality and do not discuss children, families or colleagues in public or on personal accounts.

LEADERSHIP AND MANAGEMENT

- Model child safe, respectful and accountable behaviour; provide clear roles, expectations, induction, supervision and constructive feedback.
- Ensure staffing, equipment and communication systems support lawful ratios, adequate supervision and effective program delivery.
- Respond promptly and fairly to concerns, including allegations against staff, and make required statutory reports without delay.
- Provide professional development, wellbeing support and opportunities for reflective practice and continuous improvement.
- Address conflicts of interest and maintain fair processes; a person's position or seniority does not excuse misconduct.

CHILD PROTECTION, REPORTING AND SPEAKING UP

All staff must immediately act on concerns about a child's safety or wellbeing, inappropriate staff conduct, grooming, abuse, neglect, boundary breaches or a possible reportable allegation. Notify the Nominated Supervisor or management promptly, unless they are implicated or it is unsafe to do so; in that case escalate directly to the Approved Provider or the relevant external authority. Immediate danger requires Police on 000.

Internal reporting does not replace any personal mandatory reporting or other statutory duty. Follow current NSW child protection, Office of the Children's Guardian reportable conduct, NSW Early Learning Commission notification and child protection concern recording requirements as applicable. Reports must be factual, timely, confidential and free from retaliation.

PROFESSIONAL BOUNDARIES WITH CHILDREN AND FAMILIES

- Do not contact children privately, arrange unsanctioned meetings, exchange personal messages or connect with children through personal social media or gaming accounts.
- Use approved service channels for family communication; disclose pre-existing family relationships or potential conflicts of interest to management.
- Do not provide unauthorised private transport, gifts, childcare arrangements or personal services to children or families where they create a safeguarding or conflict risk.
- Respect children's privacy in toileting, changing, first aid, photographs and conversations; follow safeguarding and supervision procedures.

PERSONAL DEVICES, IMAGES AND ONLINE SAFETY – OOSH AND LONG DAY CARE

From 27 February 2026, centre-based education and care services are subject to strengthened National Law requirements. Staff, volunteers and students must not use or possess personal image-capable devices (including mobile phones and smartwatches) while working directly with children, except where a lawful exception applies. A Nominated Supervisor's informal permission to carry a personal phone for group numbers or ratio messages is not, by itself, sufficient.

A personal-device exception may apply for prescribed excursion/transport safety circumstances or other permitted purposes, including appropriate Approved Provider written authorisation where required. The authorisation and its records must meet legal requirements. A personal device must never be used to capture, store or transmit images of children, even when an exception allows its possession or use.

- Only service-supplied devices may be used to capture, store or transmit images of children at Cubby's centre-based OOSH and long day care services, subject to required family authorisations and service procedures.
- Service-supplied devices must be used only for education and care purposes, not personal accounts, personal social media or personal messaging.
- Use service-supplied radios/phones or other approved communication systems for headcounts, transitions and educator contact; plan appropriate arrangements for excursions and emergencies.
- Store personal devices away from children while working directly with them; report any accidental image capture, device loss or suspected information breach immediately.
- Never post children's images, identifying information or service incidents to personal social media; only authorised staff may post approved service content.

CONFIDENTIALITY, EMAIL AND RECORDS

- Create complete, accurate, objective and timely records, including attendance, incidents, risk assessments and child protection concerns.
- Access records only for legitimate duties and disclose information only where authorised or required by law.
- Protect service email, accounts, passwords, devices and documents; do not share logins or send child information through unauthorised platforms.
- Comply with applicable privacy, records retention and information security policies; confidentiality obligations continue after employment ends.

SOCIAL MEDIA AND PUBLIC COMMENT

Employees may use personal social media in their own time but must maintain confidentiality, professional boundaries and lawful respectful conduct. Personal social media must not be used to disclose confidential service information, identify children without authority, harass others or imply personal opinions are official Cubby positions. Staff retain lawful workplace rights, including making protected complaints or disclosures; this Code does not prohibit lawful reporting or protected workplace activity.

FITNESS FOR WORK, SMOKING AND SUBSTANCES

- Do not attend work impaired by alcohol, illicit drugs or any medication that makes safe performance of duties impossible; promptly advise management of functional safety limitations without unnecessary disclosure of private medical details.
- Do not consume alcohol, use illicit drugs, smoke or vape in prohibited areas or while responsible for children.
- Where impairment is suspected, management must promptly manage supervision and child safety risks and follow fair workplace processes.

PRESENTATION, HYGIENE AND WORK HEALTH AND SAFETY

- Wear appropriate uniform and safe, practical clothing and enclosed footwear suitable for active supervision, indoor/outdoor play and emergency response.
- Maintain personal hygiene and follow food safety, infection control, sun safety and WHS procedures.
- Use jewellery and accessories safely and manage foreseeable snagging, allergy or choking risks, particularly in long day care with younger children.
- Report hazards, injuries, near misses and unsafe practices and cooperate with risk controls.

RECRUITMENT AND ONGOING SUITABILITY

The Approved Provider will complete and document required Working with Children Check verification, identity and suitability checks, reference checks and relevant regulatory enquiries before engagement. Suitability and required qualifications/training will be monitored during employment. Staff must promptly disclose any relevant changes to their legal eligibility or capacity to work safely with children. Recruitment and disciplinary processes will comply with applicable employment and privacy law.

BREACHES, FAIR PROCESS AND DISCIPLINARY ACTION

Potential breaches will be assessed proportionately, promptly and fairly. Depending on seriousness, responses may include immediate protective action, support and training, coaching, formal warnings, investigation, disciplinary action up to dismissal, and/or statutory notification. Serious child safety matters may require immediate removal from child-facing duties while investigated. Procedural fairness, privacy, relevant employment law and non-retaliation will be respected. No list of examples automatically determines dismissal.

CODE OF CONDUCT AGREEMENT

I confirm that I have read and understood this Code of Conduct, understand how to raise concerns and report child safety matters, and agree to comply with the Code and relevant service policies.

NAME		SIGNATURE	
POSITION		DATE	

STATUTORY LEGISLATION & CONSIDERATIONS

Education and Care Services National Law as applied in NSW (including child safety paramountcy, personal devices and images); Education and Care Services National Regulations (NSW), including required child safe and digital technology policies; National Quality Standard, particularly QA2, QA4 and

QA7; Child Protection (Working with Children) Act 2012 (NSW); Children's Guardian Act 2019 (NSW); Work Health and Safety Act 2011 (NSW); relevant anti-discrimination, privacy and employment laws; MTOP V2.0 for OOSH and EYLF V2.0 for long day care.

SOURCES

ACECQA – Guide to the National Quality Framework; ACECQA – Using digital devices in centre-based education and care services (2026); ACECQA – Strengthened NQF child safety and protections; NSW Early Learning Commission – child safety reforms; Office of the Children's Guardian – reportable conduct guidance; Early Childhood Australia – Code of Ethics.

4.02 Responsible Person Policy

INTRODUCTION

A Responsible Person must be physically present at each Cubby OOSH education and care service whenever children are being educated and cared for. The Responsible Person arrangement provides clear day-to-day leadership and accountability for safe operations, including before school care, after school care and vacation care.

PURPOSE

To ensure every service has an eligible, appropriately appointed and clearly identified Responsible Person at all required times, with documented acceptance, accurate records, effective handovers and arrangements for unexpected absences.

SCOPE AND SERVICE DIFFERENCES

This policy applies to the Approved Provider, persons with management or control, Nominated Supervisors, persons placed in day-to-day charge, Responsible Persons and staff. The same requirement for a Responsible Person physically present applies at long day care services. Each long day care service must separately meet the applicable infant/toddler ratios, qualifications, supervision and sleep/rest obligations; OOSH must meet the applicable school-age requirements. The learning framework is My Time, Our Place V2.0 for OOSH and EYLF V2.0 for long day care.

PARAMOUNT CONSIDERATION

The safety, rights and best interests of children are paramount in decisions about Responsible Person appointments, staffing, handovers, supervision and escalation. A service must not continue educating and caring for children without the required Responsible Person physically present, even if doing so creates an operational inconvenience.

WHO MAY BE THE RESPONSIBLE PERSON

Under section 162 of the National Law, the Responsible Person must be one of the following:

- The Approved Provider, or a person with management or control of the service, where legally eligible and present.
- A Nominated Supervisor of the service who is present.
- A person placed in day-to-day charge of the service under section 162 and Regulation 117A, who is present and has accepted the role in writing.

A person placed in day-to-day charge must be at least 18 years old, have adequate knowledge and understanding of education and care, and have the ability to effectively supervise and manage the service. The Approved Provider must make and document appropriate enquiries about suitability. Cubby may prefer substantial sector experience, but three years' experience is an organisational preference rather than a universal statutory minimum.

APPOINTMENT, CONSENT AND SUITABILITY

- The Approved Provider will verify the eligibility and suitability of any person proposed for day-to-day charge, including relevant Working with Children Check status, experience, knowledge, skills, ability and any applicable regulatory restrictions.
- Written consent must be obtained before a person is placed in day-to-day charge, and the appointment/consent record must be retained as required.
- Nominated Supervisors must separately provide the written consent required for their appointment. Consent to be a Nominated Supervisor is not interchangeable with consent to be placed in day-to-day charge.
- Appointments must be reviewed when circumstances, restrictions, employment or suitability change; staff must promptly advise management of any issue affecting eligibility.
- The Responsible Person must understand service-specific risk assessments, child protection, incident and emergency response, attendance, safe arrival, medical conditions, authorised collection, staff supervision and escalation procedures.

RESPONSIBLE PERSON COVERAGE AND HANDOVER

- The roster must identify the intended Responsible Person for every session and any planned handovers.
- A Responsible Person must be physically present throughout the period children are educated and cared for; remote availability by phone does not satisfy this requirement.
- Before the current Responsible Person leaves, an eligible incoming Responsible Person must be physically present, accept the handover and be recorded as assuming responsibility.
- The handover must communicate essential child safety and operational matters, including attendance/headcounts, medical needs, incidents, staffing/ratios, children requiring additional support, excursions, emergencies and outstanding concerns.
- Record the outgoing and incoming names and actual start/end times in the Responsible Service Record or approved digital system; correct the displayed Responsible Person name immediately.
- Where the incoming Responsible Person is absent or ineligible, the current Responsible Person must remain until lawful coverage is arranged. If coverage cannot be secured, management must act immediately to avoid operating without the required Responsible Person and ensure children remain safe.

DISPLAY AND STAFF RECORDS

- The name and position of the Responsible Person in charge must be displayed clearly and accurately at the service in accordance with Regulation 173.
- Maintain a record of the Responsible Person for each period of operation and the required staff records under Regulations 150 and 151, including educators' working directly with children where applicable.
- Records may be held securely in OWNA or another approved service system, with access available for authorised review and regulatory inspection.
- The Responsible Person register must reflect actual coverage, not merely the planned roster; any changes must be promptly entered.

RESPONSIBILITIES OF THE RESPONSIBLE PERSON

- Lead day-to-day safe operations, including child protection, adequate supervision, attendance and safe arrival/departure.
- Ensure staffing arrangements meet applicable ratios, qualification requirements and risk-based supervision needs; escalate shortages immediately.
- Respond to incidents, illness, emergencies, hazards and allegations and ensure required notifications are escalated to the Approved Provider.
- Support educators, implement service policies and risk assessments, maintain professional communication and preserve confidentiality.
- Provide accurate and timely handover and records; report unresolved risks and concerns to management.
- Understand that being placed in day-to-day charge does not automatically make the person the Nominated Supervisor or transfer every statutory obligation of the Approved Provider.

RESPONSIBILITIES OF THE APPROVED PROVIDER AND NOMINATED SUPERVISOR

- Ensure adequate numbers of eligible persons are available to cover all sessions, leave, breaks, absences and emergencies.
- Verify eligibility, obtain and retain required written consents, and keep appointment and Responsible Person records current.
- Ensure training, supervision, access to policies, emergency systems and authority to escalate safety concerns.
- Make required regulatory notifications relating to Nominated Supervisors, service approvals or other prescribed changes within applicable timeframes; do not apply one blanket seven-day deadline to all personal changes.
- Audit Responsible Person rosters, display and actual handover records and promptly rectify gaps.

LONG DAY CARE APPLICATION

At each Cubby long day care service, the Responsible Person requirement and appointment/handover rules remain the same. However, staffing arrangements and daily operational decisions must reflect younger children's needs, including infant and toddler supervision, prescribed educator-to-child ratios and qualifications, sleep/rest monitoring, safe feeding and nappy changing, and EYLF V2.0. A person suitable to lead OOSH must not be assumed automatically competent to manage long day care without appropriate knowledge and support.

BREACHES AND CONTINUOUS IMPROVEMENT

Any gap in Responsible Person coverage, inaccurate display, missing consent or deficient handover must be reported promptly to management, documented, risk-assessed and corrected. Repeated or serious breaches may result in performance management and statutory notifications where required. The policy and related registers will be reviewed at least annually and after relevant incidents or legal changes.

STATUTORY LEGISLATION & CONSIDERATIONS

Education and Care Services National Law (NSW), including sections 161–162 and the paramount consideration of children's safety, rights and best interests; Education and Care Services National Regulations, including Regulations 117A, 150, 151, 168, 173 and applicable records/notification provisions; National Quality Standard QA2, QA4 and QA7; Child Protection (Working with Children) Act 2012 (NSW); My Time, Our Place V2.0 (OOSH); EYLF V2.0 (long day care).

SOURCES

ACECQA – Guide to the National Quality Framework (2026); ACECQA – Responsible Person requirements; ACECQA – Quality Area 4 Staffing Arrangements; NSW Early Learning Commission – regulatory and child safety guidance.

4.03 Educational Leader Policy

INTRODUCTION

The Educational Leader inspires, mentors and challenges educators to develop, implement and critically reflect on meaningful educational programs. Educational leadership is collaborative and responsive to children, families, educators and the individual service context.

PURPOSE

Cubby OOSH will designate an Educational Leader for each service to lead the development and implementation of the educational program, strengthen educator practice and contribute to ongoing quality improvement. The role supports play, leisure, relationships, agency, wellbeing and inclusion in before school care, after school care and vacation care.

SCOPE AND APPROVED LEARNING FRAMEWORKS

This policy applies to the Approved Provider, Nominated Supervisors, Educational Leaders and educators across Cubby education and care services. Educational leadership is guided by the approved learning framework relevant to each service: My Time, Our Place V2.0 (MTOP V2.0) for school-age OOSH programs and Belonging, Being & Becoming: Early Years Learning Framework V2.0 (EYLF V2.0) for long day care. The same expectations for professional leadership, child safety, inclusion, mentoring and continuous improvement apply across services, with educational practice adapted to children's ages, development, interests and care setting.

DESIGNATION AND SUPPORT

- The Approved Provider will designate in writing a suitably qualified and experienced educator, coordinator or other individual as Educational Leader under Regulation 118.
- The designation will be documented in the staff record in accordance with Regulation 148, and the Educational Leader will understand and acknowledge their position description.
- Selection considers curriculum knowledge, communication, mentoring ability, reflective practice and capacity to support educators; the Regulations do not prescribe a separate universal Educational Leader qualification or a fixed minimum number of years of experience.
- The Approved Provider and Nominated Supervisor will provide practical access to resources, information, mentoring, training and reasonable planned time to perform the role, having regard to safe staffing and operational requirements.
- There is no universal statutory entitlement to a fixed two hours of Educational Leader programming time each week. Any protected non-contact time will be determined through service planning, employment arrangements and safe staffing needs.
- An Educational Leader may also hold another position, but the responsibilities and time demands of each role must be considered so educational leadership remains effective.

PARAMOUNT CONSIDERATION AND CHILD SAFE EDUCATIONAL LEADERSHIP

The safety, rights and best interests of children are paramount in educational leadership decisions. The Educational Leader promotes child safe practice, listens to children, respects dignity and cultural

identity, and challenges any curriculum or educator practice that may place children at risk. Concerns must be escalated through child protection, incident and governance processes without delay.

RESPONSIBILITIES OF THE EDUCATIONAL LEADER

- Lead collaborative planning, implementation and evaluation using the relevant approved learning framework—MTOP V2.0 for OOSH and EYLF V2.0 for long day care.
- Support educators to recognise children's strengths, interests, ideas, friendships, family and community connections and diverse capabilities.
- Promote children's voice, choice and agency through play, leisure, relationships, rest, creativity, exploration and developmentally appropriate experiences.
- Guide intentional teaching, responsive caregiving, inclusive practices, critical reflection, environments and respectful relationships appropriate to each service and age group.
- Mentor educators through discussion, observation, constructive feedback, team meetings, professional learning and shared reflection.
- Help educators maintain meaningful, proportionate documentation of the planning cycle, including applicable school-age or early childhood documentation requirements.
- Collaborate with families, schools, relevant professionals and community partners where appropriate and authorised.
- Promote Aboriginal and Torres Strait Islander perspectives, cultural safety, equity and respectful inclusion across the program.
- Review program strengths and improvement opportunities and contribute to Quality Area 1 and relevant areas of the service's QIP or NSW Self-Assessment Working Document.
- Raise concerns about unsafe practice, lack of resources, exclusion, supervision or barriers to children's participation with the Nominated Supervisor or Approved Provider.

EDUCATIONAL PROGRAM AND PRACTICE

- Recognise children's needs for play, belonging, relationships, choice and wellbeing, including leisure and increasing independence in OOSH and responsive caregiving and early learning in long day care.
- Use children's interests, family feedback and educator reflection to adapt experiences, resources, environments, routines and transitions.
- Support positive transitions between home, school, OOSH and other care settings as relevant to the child.
- Balance planned experiences with spontaneous interests, child-initiated play, rest, exploration and developmentally appropriate support.
- Support educators to explain how the program responds to children and the relevant approved learning framework, with documentation proportionate to each service's requirements.

COLLABORATION, REFLECTION AND QUALITY IMPROVEMENT

- The Educational Leader and Nominated Supervisor will agree on realistic priorities and opportunities to meet with educators; fortnightly team-leader meetings may be a Cubby operational goal rather than a legal requirement.

- Educational Leaders will participate in regular reflective discussions, program reviews, curriculum checks and self-assessment.
- Leadership impact will be evaluated through changes to educator practice, children's experiences, inclusion, family/child feedback and identified quality improvements.
- Educational leadership should be distributed: all educators contribute to planning and critical reflection, while the designated Educational Leader guides and supports the process.

EDUCATIONAL LEADER RECORDS AND RESOURCES

Cubby may maintain an Educational Leader folder or secure digital record containing the written designation, position description, professional goals, service philosophy, program reviews, mentoring notes, meeting records, critical reflections, relevant resources and QIP contributions. Documentation must be purposeful, proportionate, confidential and accessible to authorised personnel. The folder is a Cubby management tool, not a separately prescribed statutory folder.

RESPONSIBILITIES OF MANAGEMENT AND EDUCATORS

- The Approved Provider ensures written designation, suitable support and compliance with the National Law and Regulations.
- The Nominated Supervisor supports protected opportunities for educational leadership, collaboration and implementation of improvements while maintaining adequate supervision and staffing.
- Educators actively contribute children's ideas, planning, documentation and reflection and engage respectfully with feedback and mentoring.
- All staff uphold child safety, confidentiality and the service philosophy and communicate barriers to implementing the program.

STATUTORY LEGISLATION & CONSIDERATIONS

Education and Care Services National Law as applied in NSW, including the paramount consideration of children's safety, rights and best interests; Education and Care Services National Regulations, particularly Regulations 73–76 (educational program and documentation), 118 (Educational Leader), 145 and 148 (staff records and designation) and 173 (prescribed display information), as applicable; National Quality Standard, particularly QA1, QA4 and QA7; MTOP V2.0 for OOSH and EYLF V2.0 for long day care.

SOURCES

ACECQA – Guide to the National Quality Framework (2026); ACECQA – Educational Leadership; ACECQA – Approved Learning Frameworks; Australian Government – My Time, Our Place V2.0 and Belonging, Being & Becoming V2.0; NSW Early Learning Commission – education and care requirements.

4.04 Team Member Induction Policy

INTRODUCTION

A structured induction enables every new team member to understand Cubby's philosophy, child safe expectations, service operations and their responsibilities before undertaking duties independently. Induction is supported by supervision, mentoring, feedback and ongoing professional learning.

PURPOSE

Cubby education and care services will provide a consistent, documented and role-appropriate induction that prepares employees, casual educators, volunteers, students and other relevant personnel to work safely, respectfully and effectively with children and families.

SCOPE

This policy applies across Cubby's before school care, after school care, vacation care and long day care services. Induction has two complementary components: online/pre-commencement learning and a practical, service-specific on-site induction. Content is tailored to the person's role, children's ages, service environment and applicable legal requirements.

Educational practice in school-age services is guided by My Time, Our Place V2.0, while early childhood services use the Early Years Learning Framework V2.0. Staff must understand the framework relevant to the service in which they work.

PARAMOUNT CONSIDERATION AND CHILD SAFE INDUCTION

The safety, rights and best interests of children are the paramount consideration in education and care decisions. No new team member will be allocated duties beyond their verified eligibility, training, competence or capacity to supervise children safely. Induction must equip staff to recognise, prevent, respond to and report child safety concerns, including concerns involving other adults.

IMPLEMENTATION

Before commencement – Management and staffing team

- Provide the employment agreement or engagement documents, position description, reporting lines, conditions, payroll and Fair Work information as applicable.
- Verify identity, Working with Children Check and any required qualification, first aid, child protection training, registration, employment eligibility and suitability requirements before duties requiring them begin.
- Arrange access to approved induction modules, current policies, the team member handbook and relevant forms. Cubby aims for completion of assigned online learning within 48 hours of receiving access before the first shift where practicable; safety-critical modules must be completed before relevant duties.
- Record training and verification, identify any outstanding requirements and arrange supervision or restrict duties until requirements are met.
- Identify service-specific considerations, including children's medical conditions, inclusion supports, emergency plans, staffing arrangements and safe arrival/collection procedures.

On-site induction – First shift

The Nominated Supervisor, Responsible Person or delegated competent mentor will complete a documented on-site induction before the team member assumes independent responsibilities. It will include:

- Service tour: entry and exits, child-accessible spaces, toilets, first aid, emergency equipment, evacuation points, assembly areas, hazards, restricted areas and supervision boundaries.
- Service hours, daily routines, arrival and departure, attendance and headcounts, missing-child escalation, school transitions and vacation care or excursion procedures where relevant.
- Service philosophy, Code of Conduct, child safe culture, positive behaviour guidance, inclusion, professional boundaries, child voice and respectful relationships.
- Child protection: signs and disclosures, mandatory reporting, internal escalation, reportable conduct, record keeping and immediate danger response.
- Emergency management: fire, evacuation, lockdown, drills, incident/injury/illness response and who is Responsible Person on duty.
- Medical management: allergies, anaphylaxis, asthma, diabetes, medication authorisations, health plans, infection control, food safety and individual care needs relevant to assigned duties.
- Supervision and staffing: applicable educator-to-child ratios, active supervision, deployment, break coverage, handover, and when to request assistance.
- Approved technology, service-supplied devices, image permissions, personal device restrictions, privacy, confidentiality, record access and cyber safety.
- WHS, manual handling, sun protection, hygiene, reporting hazards, incident records, staff wellbeing and respectful workplace conduct.
- Programming and documentation: the applicable approved learning framework, educational leader support, observations/reflection, children's participation and program expectations.
- Introductions to colleagues, management and school or community contacts where relevant; communication and escalation channels; location of service records and policies.
- Opportunity to ask questions, demonstrate understanding and identify further training or adjustments needed.

Supervision, mentoring and first four weeks

New team members will be allocated an appropriate mentor or contact person. Cubby's four-week mentoring approach supports staged practice, feedback, goal setting and critical reflection. Mentoring is adjusted to the team member's experience, employment pattern and service needs; it does not replace mandatory induction, competency checks or required supervision.

- The supervisor or mentor checks understanding of critical procedures and observes practical application before assigning tasks independently.
- Follow-up conversations address questions, program practice, communication, wellbeing, role expectations and any additional training.
- Any performance or safety concern is documented and escalated promptly; further coaching or restrictions on duties are applied where necessary.

- Completion and follow-up are recorded on the New Team Member Induction checklist or approved digital system.

Casual, relief and transferring educators

Casual and relief staff must receive a concise but effective service-specific safety briefing at every unfamiliar service, even when they have completed organisation-wide online induction. This includes current Responsible Person, children's attendance and medical alerts, emergency arrangements, supervision zones, ratios, transitions, child protection reporting and service communication systems. Staff transferring between OOSH and long day care must be oriented to different age groups, routines, approved learning frameworks and service-specific staffing, sleep/rest, hygiene and supervision obligations before commencing relevant duties.

Students, volunteers and contractors

Induction is proportionate to the individual's duties and contact with children. Relevant persons must understand child safe conduct, supervision and access boundaries, reporting processes, confidentiality, emergency response and the requirement not to be left alone with children unless lawfully authorised and appropriately supervised. Required suitability checks and records must be completed before engagement.

Ongoing induction and refresher training

Cubby will review induction content when legislation, child safety guidance, policies, technology, service risks or operations change. All team members will complete annual policy and child safety refreshers, together with any role-specific training required more frequently. Staff returning from extended leave or changing roles will receive targeted updates. Completion and competency evidence will be recorded.

RESPONSIBILITIES

- Approved Provider/Management: maintain an effective induction system, verify suitability, allocate resources, keep training records and monitor completion.
- Nominated Supervisor/Responsible Person: deliver site-specific induction, ensure staff are competent and safely deployed, and address outstanding training or risks.
- Educational Leader/Mentor: support program and pedagogy orientation, reflective practice, inclusion and professional growth.
- Team members: complete training honestly, ask questions, follow procedures, maintain qualifications and report concerns or training needs promptly.

INDUCTION RECORDS AND REVIEW

Maintain completed checklists, acknowledgements, relevant verification, training dates, mentor records and follow-up actions securely in approved personnel systems. Limit access to authorised persons and retain records for applicable legal and organisational periods. Review the effectiveness of induction using staff feedback, observations, incidents, audits and quality improvement activities.

STATUTORY LEGISLATION & CONSIDERATIONS

Education and Care Services National Law as applied in NSW (including paramount consideration); Education and Care Services National Regulations (including regulations 84, 118, 145–151, 168, 170, 177 and relevant staffing and training requirements); National Quality Standard QA2, QA4 and QA7; NSW

Working with Children Check and child protection requirements; Children's Guardian Act 2019 (NSW); Work Health and Safety Act 2011 (NSW); Fair Work Act 2009 (Cth); My Time, Our Place V2.0 and Early Years Learning Framework V2.0, as applicable.

SOURCES

ACECQA – Guide to the National Quality Framework; ACECQA – Quality Area 4 Staffing Arrangements and Quality Area 7 Governance and Leadership; ACECQA – Strengthened NQF child safety and protections; NSW Early Learning Commission – child safety reforms; NSW Office of the Children's Guardian – child safe standards and reportable conduct; Cubby New Team Member Induction and Team Member Handbook.

4.05 Educator Roster & Routines Policy

INTRODUCTION

Consistent staffing and predictable yet flexible routines support trusting relationships, children's wellbeing, safe supervision and continuity of education and care. Cubby OOSH plans rosters and daily routines to meet children's needs, service operating hours, bookings and applicable staffing requirements, while recognising the different ages and developmental needs of children across its education and care services.

PURPOSE

To establish safe, fair and practical arrangements for rostering, staff attendance, handovers, breaks, relief coverage and daily routines. Rosters must support compliance with the National Law and Regulations, adequate supervision, the approved educational program and continuity of educators.

SCOPE

This policy applies to management, Nominated Supervisors, Responsible Persons, educators, relief and casual staff across Cubby education and care services. It focuses on before school care, after school care and vacation care, while applying relevant age-based requirements in long day care. My Time, Our Place V2.0 guides school-age care and the Early Years Learning Framework V2.0 guides early childhood programs.

PARAMOUNT CONSIDERATION AND SAFE STAFFING

Children's safety, rights and best interests are the paramount consideration when making roster, staffing, supervision and routine decisions. Budget, staff preferences, convenience and operational pressures must not override minimum legal requirements or adequate supervision. Where a roster cannot safely support the number or needs of children, management must arrange suitable coverage, adjust the environment or program, or take other lawful protective action before the risk arises.

ROSTER PLANNING AND CONTINUITY

- Prepare and review rosters using confirmed and anticipated attendance, age groups, additional support needs, planned activities, transitions, excursions, staff qualifications, breaks and opening/closing responsibilities.
- Ensure applicable educator-to-child ratios, qualification requirements and adequate supervision are maintained at all times, including breaks, transitions, toileting, school pick-ups, excursions and opening/closing periods.
- For NSW OOSH, apply the applicable school-age ratio (generally 1 educator to 15 children) and consider whether additional educators are required for adequate supervision or individual needs. Long day care must apply the relevant age-based ratios and qualification requirements; OOSH ratios must not be applied to younger children.
- Prioritise continuity of familiar educators where practicable, including a regular relief pool and appropriate handovers when staff changes occur.
- Roster a suitable Responsible Person to be physically present whenever children are being educated and cared for, with documented handovers and the current person displayed.

- Identify staff allocated to key supervision zones, arrivals and departures, medical support, transitions, food service and other higher-risk tasks.
- Communicate roster changes promptly and ensure changes are approved by the appropriate supervisor or management representative.

DAILY ROUTINES AND EDUCATIONAL PROGRAM

- Maintain clear but flexible daily routines that promote children's security, agency, inclusion, participation and wellbeing.
- For OOSH, balance routines with children's choice, leisure, play, rest, food and social connection; do not unnecessarily replicate the structure of the school day.
- For younger children, plan age-appropriate feeding, toileting, sleep/rest, hygiene and transitions and follow the applicable service policies and risk controls.
- Display or make available operational routines and program information without publicly exposing confidential child information.
- Adjust routines to children's needs, weather, emergencies, attendance changes and children's voices while maintaining safe supervision.

BREAKS, START AND FINISH TIMES

- Educators must record actual commencement, break and finish times accurately using the approved staff attendance system; no one may sign on or off for another person.
- Breaks and working hours must comply with applicable employment instruments and law. Supervisors must plan relief so that educator-to-child ratios and adequate supervision remain compliant throughout each break.
- Before leaving an assigned supervision area, an educator must confirm that another appropriately allocated educator has accepted responsibility for the children and relevant information.
- Staff must return from breaks on time and notify the Responsible Person immediately of any delay, early departure or unexpected absence.
- Rosters and timesheets must reflect actual duties and working time; required work must not be performed unpaid.

ABSENCE, SHORT-NOTICE COVER AND ESCALATION

- Staff who cannot attend or will be late must contact the designated supervisor or staffing contact as early as practicable, following the Team Member Handbook.
- The Nominated Supervisor/Responsible Person must promptly assess attendance, ratios, qualifications, child-specific needs and supervision and seek authorised replacement staff where required.
- If safe staffing cannot be maintained, escalate immediately to management; do not admit or continue caring for children beyond the service's safe and lawful capacity.
- All roster changes, coverage arrangements and significant staffing or supervision incidents must be documented in the approved system.

CASUAL, RELIEF AND CROSS-SERVICE EDUCATORS

- Use educators who have completed required pre-employment checks, induction and any role-specific mandatory training.
- Provide a site-specific handover before direct work with children, covering the Responsible Person, attendance, medical and risk plans, emergency procedures, supervision zones, authorised collections, routines and reporting channels.
- Provide supervision and support appropriate to the educator's familiarity with the service, children and age group; do not assume experience in OOSH establishes competence for younger long day care age groups or vice versa.
- Ensure relief staff have access to necessary information on a need-to-know basis without unnecessary disclosure of personal information.

SUPERVISION, TRANSITIONS AND HANDOVER

- Allocate educators to identified areas and adjust positioning as children move, numbers change or risks emerge.
- Maintain active supervision and clear accountability during school-to-OOSH transfers, arrival and departure, excursions, group changes and movement between indoor/outdoor areas.
- Communicate child-specific medical, behavioural, inclusion and safety information discreetly to staff who need it.
- Conduct accurate roll checks/headcounts as required by the service's Safe Arrival and Attendance procedures.

COMMUNICATION AND PERSONAL DEVICES

Use approved service communication systems for roster updates, supervision coordination and emergencies. Personal image-capable devices are subject to the strengthened 2026 restrictions while working directly with children, including any lawful exceptions and required authorisations. Staff must not use personal devices to photograph, store or transmit images of children. Personal calls or messages must not compromise supervision; emergencies should be managed through approved service procedures.

RECORDS AND REVIEW

- Maintain accurate rosters, staff attendance records, Responsible Person records, qualification and training evidence and relevant supervision arrangements in accordance with statutory requirements.
- Review roster effectiveness after incidents, changes in enrolments, recurring staff shortages, family feedback and changes to children's needs.
- Provide regular opportunities for educator feedback on continuity, workload, wellbeing and routine improvements.

RESPONSIBILITIES

Approved Provider/management: resource lawful and safe staffing, monitor rosters, employment obligations and escalation processes. Nominated Supervisor/Responsible Person: implement daily

roster, verify coverage, breaks, supervision, handovers and records. Educators: follow allocated duties, maintain active supervision, communicate changes promptly and record actual working time.

STATUTORY LEGISLATION & CONSIDERATIONS

Education and Care Services National Law (NSW), including the paramount consideration of children's safety, rights and best interests; Education and Care Services National Regulations, including staffing, ratios, qualifications, supervision, staff records and Responsible Person requirements as applicable; National Quality Standard QA2, QA4 (including 4.1.1 and 4.1.2) and QA7; Fair Work Act 2009 (Cth) and applicable industrial instruments; My Time, Our Place V2.0 and Early Years Learning Framework V2.0.

SOURCES

ACECQA – Guide to the National Quality Framework; ACECQA – Quality Area 4 Staffing Arrangements; NSW Early Learning Commission – staffing and ratio guidance; Fair Work Ombudsman – hours of work and breaks; Cubby OOSH Team Member Handbook and service procedures.

4.06 Learning & Development Policy

INTRODUCTION

Ongoing learning and professional development strengthen educator capability, safe practice, quality programs and respectful relationships. Cubby OOSH supports continuous learning across its education and care services, with training responsive to each service's children, age groups, educational program, workforce and regulatory obligations.

PURPOSE

To establish a fair, practical and accountable approach to induction, mandatory training, professional learning, mentoring, team meetings and evaluation of learning. Development opportunities will improve child safety, educator knowledge, inclusive practice, educational leadership and service quality.

SCOPE

This policy applies to Cubby OOSH management, Nominated Supervisors, Responsible Persons, Educational Leaders, educators and other team members, including casual and relief staff as relevant. Professional learning will reflect My Time, Our Place V2.0 in school-age care and the Early Years Learning Framework V2.0 in early childhood programs, within the same organisational approach.

CHILD SAFETY AND PARAMOUNTCY

Children's safety, rights and best interests are the paramount consideration in decisions affecting education and care. Training priorities, staffing coverage during training, supervision arrangements and responses to identified competency gaps must never compromise child safety. Where a staff member is not yet competent or authorised for a duty, appropriate support, supervision or task allocation will be arranged.

PROFESSIONAL LEARNING PRIORITIES

- Child protection, child safe conduct, mandatory reporting, reportable conduct, complaints and responding to disclosures or concerns.
- Adequate supervision, ratios, safe arrival and departure, attendance accountability, emergency management, risk assessment and excursions.
- First aid, anaphylaxis, asthma, medication, infectious disease management, food safety and other role-specific health requirements.
- Guiding behaviour, co-regulation, inclusion, disability awareness, cultural safety, Aboriginal and Torres Strait Islander perspectives and respectful partnerships with families.
- Educational program planning, critical reflection, documentation, children's agency, play and leisure, and age-appropriate learning and development.
- Safe use of digital technologies, service devices, privacy, confidentiality and information security.
- Leadership, communication, workplace respect, mentoring, conflict resolution and reflective practice.

TRAINING PLAN AND ACCESS

- Management and service leaders will identify training needs using legislation, risk assessments, incident and complaint trends, assessment and rating feedback, QIP/self-assessment, educator feedback and professional development discussions.

- A training plan will identify required courses, renewal dates, priority learning, responsible persons and available resources; individual development goals will be discussed with educators.
- Staff will be supported to access relevant learning through courses, webinars, in-service training, mentoring, coaching, team meetings and reflective discussions.
- Opportunities will be allocated fairly according to service needs, role requirements, skills gaps and educator interests, subject to approved budgets and operational coverage.
- Management will provide reasonable adjustments and accessible training arrangements where needed.

MANDATORY TRAINING AND COMPETENCY

- Before undertaking relevant duties, staff must hold and maintain qualifications, approvals, checks and training required by law or their role. Management will verify evidence and track expiry or renewal dates.
- Child protection training and other prescribed child safety training will be completed and refreshed in accordance with current NSW requirements and organisational procedures.
- Required first aid, anaphylaxis and emergency asthma qualifications must be maintained by sufficient educators on duty in accordance with applicable National Regulations and service requirements.
- Training completion alone does not replace practical competence; supervisors will check understanding and support educators to apply learning in daily practice.
- Any lapsed mandatory credential or identified competency gap must be promptly escalated, with roster or duty changes where necessary to maintain compliance.

TRAINING COSTS, TIME AND EMPLOYMENT ENTITLEMENTS

Cubby OOSH will confirm in advance whether training is required or optional, who pays course and renewal fees, whether time is paid, and any approved travel or other expenses. Required attendance at work-related training and meetings must be managed in accordance with applicable awards, enterprise agreements, contracts and Fair Work obligations. The policy does not require educators to attend compulsory workshops or monthly meetings unpaid, nor does it automatically make legally required training an employee expense. Optional self-directed study outside paid duties may be arranged by agreement, subject to employment law.

TEAM MEETINGS AND KNOWLEDGE SHARING

- Services will schedule team meetings at a frequency suited to operational needs and provide appropriate notice and employment entitlements for required attendance.
- Agendas may cover child safety, compliance updates, educational programs, children’s interests and needs, inclusion, incident trends, risk controls, routines, resources, educator wellbeing and QIP priorities.
- Educators may propose agenda items and contribute to discussion, critical reflection and problem solving.
- A record of attendance, key discussions, decisions, responsibilities and follow-up actions will be maintained.
- Educators attending external learning will be encouraged to share relevant insights and resources, without disclosing confidential or identifying information unnecessarily.

MENTORING AND EDUCATIONAL LEADERSHIP

- New and less experienced educators will receive induction, coaching and mentoring appropriate to their role and the service environment.
- Educational Leaders will support educators to connect theory, approved learning frameworks, children's voices and reflection to practical programming.
- Nominated Supervisors and managers will provide regular feedback and development opportunities, and escalate resource or competency concerns.
- Casual and relief educators will receive service-specific guidance and updates before undertaking unfamiliar responsibilities.

RECORDS AND EVALUATION

- Maintain a secure professional learning register showing training, dates, provider, completion evidence, expiry dates and planned follow-up.
- Review learning outcomes through observation, discussion, reflective practice, audit findings, child and family feedback and changes in practice.
- Update relevant policies, procedures and staff guidance when legislative or organisational requirements change, and communicate changes promptly.
- Store records securely with role-appropriate access and applicable retention requirements.

RESPONSIBILITIES

Approved Provider/Management: provide resources, verify compliance and training records, ensure fair lawful training arrangements and monitor effectiveness. Nominated Supervisor/Responsible Person: identify service needs, arrange coverage, coach staff and verify safe practice. Educational Leader: lead curriculum-related development and reflection. Team members: participate in required training, maintain relevant credentials, apply learning, raise questions and promptly report any inability to perform duties safely.

STATUTORY LEGISLATION & CONSIDERATIONS

Education and Care Services National Law (NSW), including paramountcy and child safety obligations; Education and Care Services National Regulations, including Regulations 84, 118, 136, 145–149 and 168 where applicable; National Quality Standard, particularly Quality Areas 1, 2, 4 and 7; NSW child protection and Working with Children Check legislation; Fair Work Act 2009 (Cth), applicable modern awards and employment agreements; My Time, Our Place V2.0 and Early Years Learning Framework V2.0.

SOURCES

ACECQA – Guide to the National Quality Framework; ACECQA – Quality Area 4 Staffing Arrangements and Quality Area 7 Governance and Leadership; NSW Early Learning Commission – child safety reforms and training guidance; Fair Work Ombudsman – training, meetings and hours of work; Australian Government – approved learning frameworks.

4.07 Team Member Interaction Policy

INTRODUCTION

Respectful, cooperative and professional interactions between team members help children and families feel safe, included and confident in Cubby education and care services. The way educators communicate, resolve differences and support one another models positive relationships for children and strengthens teamwork and quality practice.

PURPOSE

To establish consistent expectations for professional communication, teamwork, respectful relationships, conflict resolution and the sharing of information needed for safe, effective education and care.

SCOPE

This policy applies to all educators, Nominated Supervisors, Responsible Persons, Educational Leaders, managers, support staff, volunteers, students and contractors as appropriate, across Cubby services. It covers interactions between colleagues and management, with families, schools and other professionals, and work-related interactions through digital channels or outside ordinary working hours.

CHILD SAFETY AND PARAMOUNTCY

Children's safety, rights and best interests are the paramount consideration in decisions and actions relating to education and care. Staff disagreements, personal relationships, staffing pressures or reputational concerns must never delay supervision, the response to a child safety concern or lawful reporting. Educators must cooperate to maintain safe supervision, accurate handovers and appropriate responses to children's needs.

IMPLEMENTATION — RESPECTFUL PROFESSIONAL RELATIONSHIPS

- Treat every colleague with courtesy, dignity, fairness and empathy, valuing different backgrounds, abilities, experience and professional perspectives.
- Communicate clearly and respectfully; listen actively, ask questions and provide constructive feedback without humiliation, threats or personal attacks.
- Share responsibilities fairly, provide practical assistance during busy periods and use each person's strengths to support safe and effective service delivery.
- Model positive conflict resolution and cooperative social interactions in front of children and families.
- Maintain professional boundaries and avoid gossip, exclusion, deliberate misinformation, harassment, discrimination, bullying, intimidation or victimisation.
- Use approved service communication channels and ensure written messages, handovers and team discussions remain professional and accurate.

INFORMATION SHARING AND CONFIDENTIALITY

Educators must share relevant information about children's wellbeing, medical needs, behaviour support, authorised collection, safeguarding risks and educational experiences with colleagues who need it to perform their duties safely. Information must be factual, respectful and limited to what is

necessary. Children's and families' personal information must not be shared indiscriminately or discussed where unauthorised people may overhear.

- Use approved records and handover processes for relevant child and family information; do not rely on casual conversations alone for critical safety information.
- Discuss sensitive matters privately, on a need-to-know basis, and follow confidentiality, child protection and privacy procedures.
- Do not disclose identifiable child, family or staff information through personal social media or unauthorised messaging platforms.

TEAMWORK, MEETINGS AND PROFESSIONAL LEARNING

- Participate in team meetings, reflective discussions, planning and continuous improvement, including contributing ideas and raising concerns constructively.
- Respect the responsibilities of the Nominated Supervisor, Responsible Person, Educational Leader and colleagues while speaking up about unsafe or unlawful practices.
- Share resources, learning and professional expertise; support new, casual and relief educators through clear induction and handovers.
- Ensure meetings have clear outcomes where appropriate, with actions allocated and relevant information communicated to absent staff.
- Use educational frameworks appropriate to the children and service: My Time, Our Place V2.0 for school-age care and the Early Years Learning Framework V2.0 for early childhood programs.

CONFLICT, GRIEVANCES AND SPEAKING UP

Where safe and appropriate, team members should first seek to resolve routine misunderstandings respectfully and promptly, preferably in a private conversation. Staff may seek support from their Nominated Supervisor, manager, Human Resources or another appropriate person at any stage. A person is not required to confront an alleged harasser, bully or person involved in a serious safety concern before reporting it.

- Raise concerns through the applicable grievance, bullying and harassment, whistleblowing, child protection or incident reporting pathway, depending on the issue.
- Do not argue about personal disputes in front of children or families; immediate child safety needs always take priority.
- Do not discourage lawful complaints, protected disclosures, requests for workplace representation or reports to regulators and authorities.
- Maintain confidentiality as far as reasonably practicable, without preventing lawful reporting, advice, support or procedural fairness.
- Alleged breaches are assessed fairly and proportionately. Immediate dismissal is not automatic merely because a grievance was discussed; disciplinary decisions must follow lawful and fair processes.

MANAGEMENT RESPONSIBILITIES

- Model respectful communication and address inappropriate conduct promptly and consistently.

- Set clear expectations, role responsibilities, meeting arrangements and processes for feedback and escalation.
- Provide appropriate support, mediation or investigation when required, with confidentiality and procedural fairness.
- Monitor team culture, workload, inclusion and psychological health and safety risks, and implement reasonable controls.
- Ensure no person is disadvantaged for making a good-faith child safety report, lawful workplace complaint or protected disclosure.

DIGITAL COMMUNICATION AND PROFESSIONAL BOUNDARIES

Work-related group chats, emails, electronic records and digital meetings are subject to the same respectful conduct and confidentiality standards as face-to-face interactions. Staff must follow current service rules for personal devices and image capture, including applicable restrictions while working directly with children. Urgent safety information must be communicated through reliable, approved channels.

RESPONSIBILITIES AND REVIEW

All team members must follow this policy, seek clarification where needed and report serious concerns promptly. Nominated Supervisors and managers will support implementation through induction, supervision, team meetings, reflective practice and fair follow-up. This policy will be reviewed annually or sooner when legislation, service practice or identified risks change.

STATUTORY LEGISLATION & CONSIDERATIONS

Education and Care Services National Law as applied in NSW, including the paramount consideration of children's safety, rights and best interests; Education and Care Services National Regulations; National Quality Standard, particularly Quality Areas 2, 4 and 7; Work Health and Safety Act 2011 (NSW); Fair Work Act 2009 (Cth); applicable NSW and Commonwealth anti-discrimination and privacy laws; relevant child protection and reportable conduct requirements.

SOURCES

ACECQA – Guide to the National Quality Framework and Quality Area 4 guidance; ACECQA – paramount consideration information sheet; Safe Work Australia – psychosocial hazards guidance; Fair Work Ombudsman – bullying and workplace rights; Early Childhood Australia – Code of Ethics; My Time, Our Place V2.0 and Early Years Learning Framework V2.0.

4.08 New Team Member Selection Policy

INTRODUCTION

Cubby OOSH is committed to fair, transparent and child safe recruitment across its education and care services. Selecting suitable, capable and respectful team members supports quality programs, positive relationships, effective supervision and children's safety, rights and best interests.

CHILD SAFE COMMITMENT AND PARAMOUNTCY

Children's safety, rights and best interests are the paramount consideration in recruitment, selection, appointment and ongoing suitability decisions. Cubby has zero tolerance for child abuse. No operational pressure, staffing shortage, cost or personal connection may override a material child safety concern. Recruitment decisions will be documented and escalated when concerns arise.

PURPOSE AND SCOPE

This policy establishes consistent child safe recruitment, assessment, selection, employment checks, appointment and record-keeping practices for educators, supervisors, managers and other staff, and applies as relevant to volunteers, students and contractors. It applies across Cubby services, with a focus on OOSH and appropriate age-specific and qualification requirements for long day care.

POSITION PLANNING AND ADVERTISING

- Management approves each vacancy, position description, duties, reporting arrangements, selection criteria, classification, hours and employment conditions before advertising.
- Advertisements communicate the role, required qualifications or experience, commitment to child safety, verified Working with Children Check (WWCC) requirements and reasonable application arrangements.
- Selection criteria are job-related and inclusive. Reasonable adjustments are offered to applicants with disability; unlawful discrimination is prohibited.
- Recruitment is coordinated by authorised management or staffing personnel in consultation with the relevant service leader; appointment decisions require delegated approval.

ROLE REQUIREMENTS AND SERVICE CONTEXT

Applicants must meet the legal eligibility, suitability, qualification, training and experience requirements of the specific role and service. OOSH and long day care may have different educator qualification, educator-to-child ratio and age-specific requirements. A Diploma, Certificate IV in school age education and care or previous experience may be desirable for particular OOSH roles, but is not a universal legal requirement for every position. Likewise, two years' experience is an organisational preference only where included in approved selection criteria, not a general legal prerequisite.

Management must confirm applicable NSW requirements for the position, including eligibility for Nominated Supervisor or Responsible Person roles where relevant, and required first aid, anaphylaxis, asthma, child protection and other certifications for the service's staffing arrangements. Appointment of a person under 18 is assessed against applicable laws, role restrictions, supervision and child safety risks rather than an automatic blanket exclusion.

SHORTLISTING AND INTERVIEWS

- Applications are assessed consistently against documented role criteria; unexplained employment gaps, frequent role changes or incomplete information may be explored respectfully and without unsupported assumptions.
- Use structured, comparable questions and record evidence of qualifications, communication, judgement, inclusion, teamwork, professional boundaries and safe supervision.
- Ask safeguarding scenarios about responding to disclosures, inappropriate conduct, reporting concerns, missing children, supervision and respectful behaviour guidance.
- Where practical, use a selection panel or secondary review to reduce bias and strengthen safeguarding decisions.
- Interview notes, scoring and reasons for selection are recorded objectively and securely.

CHILD SAFE REFERENCE CHECKS

Before confirming an appointment, complete and document appropriate employment references, preferably including a recent direct supervisor who has observed the applicant working with children. Referees should be independently verified using reliable contact information where practical. A current Centre Director is not mandatory as a referee in every case, and an otherwise suitable applicant must not be automatically rejected solely because a referee cannot be verified from a centre website.

- Seek the applicant's consent to contact referees and ask about observed child safety practice, supervision, professional boundaries, reliability, teamwork and responses to concerns.
- Ask whether substantiated misconduct, child safety concerns, disciplinary findings or restrictions relevant to the role have arisen, within lawful privacy and fairness limits.
- Where references raise concerns, seek clarification, document the risk assessment and refer material safeguarding matters to authorised management before any offer is finalised.

IDENTITY, WWCC AND SUITABILITY CHECKS

- Verify identity, relevant qualifications, registrations and certificates, and the NSW WWCC clearance through the authorised verification process before the person undertakes child-related work, unless a specific lawful exemption applies.
- Check, document and assess relevant National Law prohibitions, suspensions, supervision notices, enforceable undertakings and other statutory restrictions using the enquiries and systems required by current NSW law.
- For specified personnel under Child Care Subsidy rules, complete additional fit-and-proper and suitability checks as required; these requirements do not automatically apply identically to every educator.
- Confirm work rights, role eligibility and any additional police or background checks only where legally required or justified for the role. A police check does not replace WWCC verification.
- Do not place a person in child-related duties while mandatory screening is incomplete, invalid or indicates they cannot lawfully perform the role.

ASSESSMENT OF CONCERNS AND SELECTION DECISION

A concerning interview answer, inconsistent employment history, adverse reference or screening result requires a proportionate, documented follow-up and safeguarding assessment. Decisions must distinguish verified facts from allegations, allow appropriate procedural fairness and protect confidential information. A person who cannot lawfully perform the role or presents an unacceptable risk to children will not be appointed. Escalate matters requiring statutory reporting through the appropriate pathway.

OFFER, COMMENCEMENT AND INDUCTION

- The authorised manager approves the appointment and provides a written offer setting out the role, classification, hours, pay and employment conditions, subject to required checks.
- Before child-facing duties commence, confirm screening, mandatory qualifications/training, required employment forms, signed Code of Conduct and any necessary role-specific authorisations.
- Complete and document online and on-site induction, including safeguarding, child protection reporting, emergency procedures, supervision, safe arrival, medical needs, professional boundaries, digital device rules and relevant service policies.
- Arrange appropriate supervision and mentoring, including for casual and relief educators, and confirm access to only the records and systems required for the role.
- Notify unsuccessful applicants respectfully once the selection process is complete and manage their information under the retention and privacy requirements.

ONGOING SUITABILITY AND ACCOUNTABILITY

- Maintain a secure register or approved HR system to track WWCC verification, qualifications, training, first aid and other relevant expiry/review dates.
- Employees must promptly notify management of changes affecting legal eligibility, WWCC status, relevant notices, restrictions or capacity to work safely with children; management must comply with any prescribed notification deadlines.
- Review suitability through supervision, professional development, incident and complaint processes, performance management and further enquiries where required.
- Investigate and respond promptly to concerns about staff conduct, without assuming that a current WWCC alone establishes ongoing suitability.
- Protect whistleblowers and staff who raise genuine child safety concerns; comply with mandatory reporting, reportable conduct and regulatory notification duties.

EQUAL OPPORTUNITY, CONFIDENTIALITY AND RECORDS

Selection is based on genuine inherent requirements, demonstrated capability, safeguarding and lawful criteria. Cubby does not discriminate unlawfully on the basis of disability, race, sex, age, religion, family responsibilities or other protected attributes. Personal information, reference notes, interview scores, WWCC records and recruitment decisions must be securely stored, accessed only by authorised personnel and retained or disposed of in accordance with applicable laws and organisational retention schedules.

RESPONSIBILITIES

- Approved Provider and management: maintain child safe recruitment systems, approvals, oversight, suitability enquiries, training, notifications and secure records.
- Recruitment/HR personnel: coordinate advertising, shortlisting, screening, references, offers, records and expiry monitoring.
- Nominated Supervisors and service leaders: advise on role requirements, participate in selection, support induction and report emerging suitability concerns.
- Applicants and employees: provide truthful information, complete required checks and promptly disclose relevant changes affecting eligibility or safety.

STATUTORY LEGISLATION & CONSIDERATIONS

Education and Care Services National Law (NSW), including paramount consideration and relevant staff suitability requirements; Education and Care Services National Regulations (NSW); National Quality Standard, particularly Quality Areas 2, 4 and 7; Child Protection (Working with Children) Act 2012 (NSW) and applicable regulations; Children's Guardian Act 2019 (NSW); Fair Work Act 2009 (Cth), applicable awards and anti-discrimination law; Privacy Act 1988 (Cth) where applicable; Family Assistance Law for relevant CCS specified personnel. MTOP V2.0 guides OOSH and EYLF V2.0 guides long day care educational practice.

SOURCES

ACECQA – Guide to the National Quality Framework and child safe recruitment guidance; NSW Early Learning Commission – child safety reforms and Working with Children guidance; NSW Office of the Children's Guardian – child safe recruitment and WWCC verification; Fair Work Ombudsman – recruitment and employment requirements; Australian Government Child Care Provider Handbook.

4.09 Uniform & Personal Appearance Policy

INTRODUCTION

A professional, identifiable and practical uniform helps children and families recognise Cubby team members and supports a welcoming, safe and consistent education and care environment. Presentation requirements must also be comfortable, inclusive and suitable for active supervision, play and daily care routines.

PURPOSE

To establish reasonable, safe and consistent expectations for uniforms, footwear, sun protection, hygiene and personal presentation across Cubby education and care services, while respecting individual identity, cultural practices, disability-related needs and workplace rights.

SCOPE

This policy applies to educators, supervisors, management, casual and relief staff, students and volunteers as appropriate to their roles. It applies across Cubby OOSH and long day care services together. The same principles apply, with practical adjustments for the ages of children, activities, food handling, infant care, outdoor work and service-specific risks.

CHILD SAFETY AND PARAMOUNTCY

Children's safety, rights and best interests are the paramount consideration when applying appearance requirements. Clothing, footwear, accessories and hair must not create foreseeable injury, hygiene or supervision risks. Decisions about reasonable adjustments will consider children's safety alongside employees' lawful rights and individual circumstances.

UNIFORM AND IDENTIFICATION

- Employees will wear the current Cubby-approved uniform or other clothing authorised for their position and duties. Branded clothing helps children, families and visitors identify staff.
- Uniforms must be clean, in good repair and appropriate to the weather, duties and setting. Reasonable wear and tear will be managed through the approved replacement process.
- Casual, relief and new employees who have not yet received uniform items may wear neat, practical clothing approved by management, with identification where required.
- Additional layers for warmth, sun protection, disability, pregnancy, religion or cultural observance may be approved where they are safe and practical.
- Uniform issue, return and replacement arrangements will be communicated in writing. Any employee payment, bond or wage deduction must comply with the applicable award, Fair Work Act and lawful written authorisation requirements; deductions are not automatic.

TROUSERS, SHORTS AND ACTIVE CLOTHING

- Wear practical, clean and suitably fitted black or other management-approved trousers, shorts or activewear that allow safe bending, lifting, running, floor-based play and supervision.
- Shorts and other garments must provide appropriate coverage for active duties; restrictive, excessively loose or unsafe clothing is not suitable.
- Clothing requirements will be applied consistently without unnecessary gender-based distinctions or restrictions on reasonable cultural and disability-related adjustments.

FOOTWEAR

- Wear enclosed, secure, supportive, non-slip footwear suitable for active work, outdoor play and emergency movement. Appropriate enclosed joggers are acceptable.
- Open-toed footwear, unstable high heels and shoes presenting a foreseeable slip, trip or injury risk are not suitable during direct care.
- Food preparation, cleaning and other higher-risk tasks may require additional protective footwear identified by the relevant risk assessment or work health and safety procedures.

SUN PROTECTION AND OUTDOOR WORK

- Wear a sun-safe hat and suitable protective clothing outdoors in accordance with the Sun Protection Policy, current UV guidance and service risk assessment. A service-issued hat is preferred, with safe alternatives permitted where necessary.
- Model appropriate sun protection for children and follow the service's shade, sunscreen, hydration and outdoor supervision practices.
- Religious or cultural head coverings may be worn where they provide appropriate protection and do not create an unmanaged safety risk.

HAIR, NAILS AND PERSONAL HYGIENE

- Maintain personal cleanliness and hygiene appropriate to work with children and food.
- Secure long hair when required to prevent contact with food, bodily fluids or equipment, or when hair could interfere with supervision or care tasks.
- Keep nails clean and at a length and condition that do not create scratching, infection-control or food-handling risks. Artificial nails and nail products must be assessed against the employee's duties and applicable food safety requirements.
- Strong fragrances should be avoided where they may affect children or colleagues with sensitivities or medical needs.

JEWELLERY, PIERCINGS AND ACCESSORIES

- Jewellery, watches, lanyards and piercings must not create choking, snagging, scratching, hygiene or manual-handling hazards.
- Staff working with infants or young children, or undertaking physical play and personal care, may need to remove or secure items that can be pulled or caught.
- Religious, cultural and disability-related accessories will be accommodated where reasonably practicable, with alternative controls considered before restrictions are imposed.
- Smartwatches and other image-capable personal devices must comply with Cubby's Digital Technologies and Online Safety policies and current centre-based child safety restrictions; being worn as an accessory does not exempt a device.

TATTOOS, MAKE-UP AND PERSONAL EXPRESSION

Any restriction must be justified by child safety, hygiene, lawful professional requirements or genuinely inappropriate content (for example discriminatory, sexually explicit or threatening imagery). Make-up is optional and must not interfere with hygiene or safe care.

PRACTICAL REQUIREMENTS FOR DIFFERENT DUTIES

Managers will consider the duties and ages of children when applying this policy. This may include safe clothing for outdoor OOSH games and excursions, safe manual handling and close-contact care for younger children, suitable clothing for messy play and cleaning, and protective items for food preparation. Where protective clothing or equipment is required by risk assessment or law, Cubby will ensure it is provided and used appropriately.

REASONABLE ADJUSTMENTS AND FAIR APPLICATION

Staff may request adjustments for disability, pregnancy, medical, cultural or religious needs. Management will discuss practical alternatives confidentially, assess genuine risks and avoid unnecessary or discriminatory requirements. Uniform rules will not be applied in a way that compromises child safety, unfairly disadvantages an employee or conflicts with applicable workplace law.

NON-COMPLIANCE AND SUPPORT

Where presentation or clothing is unsuitable, the supervisor will explain the concern, identify an appropriate safe alternative and allow a reasonable opportunity to rectify it. If an immediate risk exists, duties may be temporarily adjusted while safe arrangements are made. Repeated or serious breaches may be managed under the Code of Conduct and fair performance or disciplinary procedures. Staff will not automatically be sent home without pay or dismissed for a first appearance issue; pay and disciplinary outcomes must comply with workplace law.

RESPONSIBILITIES

- Approved Provider/management: provide clear uniform information, lawful issue and replacement arrangements, risk-based adjustments and fair application.
- Nominated Supervisor/Responsible Person: model expectations, address immediate safety concerns and support reasonable adjustments.
- Educators, staff, students and volunteers: wear suitable clothing and footwear, maintain hygiene, follow protective equipment directions and raise concerns promptly.

STATUTORY LEGISLATION & CONSIDERATIONS

Education and Care Services National Law and National Regulations as applied in NSW; National Quality Standard, including Quality Areas 2, 4 and 7; Work Health and Safety Act 2011 (NSW); Fair Work Act 2009 (Cth) and applicable modern awards or enterprise agreements; relevant anti-discrimination and privacy legislation; Cubby Sun Protection, Code of Conduct, Work Health and Safety, Digital Technologies and Induction policies.

SOURCES

ACECQA – Guide to the National Quality Framework and child safety guidance; SafeWork NSW – workplace clothing and personal protective equipment guidance; Fair Work Ombudsman – deductions from pay, uniforms and work-related expenses; Cancer Council Australia – SunSmart guidance.

4.10 Smoke-Free and Vape-Free Environment Policy

INTRODUCTION

Cubby OOSH is committed to protecting children, families, educators and visitors from tobacco smoke, second-hand vapour and associated health and safety risks. Children learn from the conduct of adults around them, and all Cubby education and care services must provide a safe, healthy and smoke-free environment.

PURPOSE

To maintain smoke-free and vape-free education and care premises, support safe and consistent staff practices, prevent children's exposure to smoking and vaping, and meet applicable NSW and National Quality Framework requirements.

SCOPE

This policy applies to all Cubby OOSH education and care services, including before school care, after school care, vacation care and long day care, and to the Approved Provider, Nominated Supervisors, Responsible Persons, educators, employees, volunteers, contractors, families and visitors. Requirements apply to service premises, indoor and outdoor areas, vehicles used for service activities and off-site activities under service supervision.

CHILD SAFETY AND PARAMOUNTCY

Children's safety, rights and best interests are the paramount consideration when applying this policy. No child is to be exposed to smoking or vaping during education and care, and staffing, break arrangements and responses to breaches must not compromise adequate supervision or children's wellbeing.

IMPLEMENTATION

Smoke-free and vape-free premises

- Smoking tobacco, using e-cigarettes or vaping products, and using any other smoking or inhalation device are prohibited throughout the service premises, including all indoor and outdoor spaces, entrances, toilets, storage areas and play spaces.
- The prohibition applies whenever the premises are used to provide education and care, including set-up, pack-down, excursions and service-operated activities. Cubby also applies this rule to its premises as an organisational expectation outside session times where it controls the premises.
- No-smoking and no-vaping signage will be displayed prominently where appropriate. Service staff will communicate requirements to visitors and families respectfully.
- Smoking or vaping must not occur in service vehicles, or in vehicles while transporting children as part of service activities.
- Where a service operates on school or shared premises, staff must also comply with applicable school-site rules and NSW smoke-free laws, including any additional outdoor restrictions.

Entrances, boundaries and public areas

NSW smoke-free legislation restricts smoking and vaping in specified public areas, including within four metres of a pedestrian access point to a public building where that rule applies. Cubby will apply the relevant legal restrictions and any stricter site rules. The four-metre rule must not be described as a universal boundary for every part of an education and care premises; smoking and vaping are prohibited across the entire service premises under the National Regulations.

Educators, employees and break arrangements

- Employees must not smoke or vape while supervising children, during work duties, on service premises, or where doing so would expose children to smoke, vapour or related residues.
- Smoking or vaping during a lawful break may occur only off the premises, in a location where it is lawful and does not expose children, families or others to smoke or vapour. Staff must remain mindful of school and shared-site restrictions.
- Breaks must be approved and arranged so that required educator-to-child ratios, adequate supervision and the presence of a Responsible Person are maintained.
- Before returning to direct care, employees must wash their hands and ensure clothing and personal hygiene do not expose children to smoke or vaping residue. Change contaminated outer clothing where necessary.
- Staff must safely store cigarettes, vapes, e-liquids, nicotine products, lighters and related items so children cannot access them; they must not be stored in children's accessible areas.
- The service will not require employees to brush their teeth, use deodorant or conceal lawful off-duty behaviour for branding reasons. Hygiene and exposure prevention, rather than appearance, determine safe return to duties.

Families, visitors and contractors

- Any person observed smoking or vaping on service premises will be asked to stop immediately and, if necessary, move off the premises.
- Educators will respond calmly and without confrontation, prioritising children's supervision and safety.
- If a person refuses to comply, the Responsible Person or management will assess the risk, request that the person leave where lawful, and seek assistance from the school, property manager or Police if safety is threatened.
- Concerns, repeated breaches or incidents affecting children will be documented and escalated under the service's incident, complaint and child safety procedures.

Vaping products and nicotine exposure

Vapes and e-liquids may contain nicotine and other substances hazardous to children. Suspected ingestion, skin or eye exposure, breathing difficulty or other poisoning symptoms must be treated as a medical incident. Keep the child safe, follow first aid and emergency procedures, contact the Poisons Information Centre on 13 11 26 for poisoning advice, and call 000 for an emergency. Preserve relevant information about the product without allowing further child access.

Responsibilities and compliance

- The Approved Provider and management will maintain the policy, signage, risk controls, staff communication and review arrangements.
- Nominated Supervisors and Responsible Persons will implement the policy, arrange safe staff breaks, respond to breaches and ensure child safety is prioritised.
- All team members must model healthy behaviour, comply with site restrictions, report breaches and hazards promptly, and never leave children inadequately supervised to address smoking or vaping.
- Breaches by staff will be managed fairly and proportionately under the Code of Conduct and applicable workplace procedures; serious child safety risks may require immediate protective action.

STATUTORY LEGISLATION & CONSIDERATIONS

- Education and Care Services National Law as applied in NSW, including section 167 and the paramount consideration of children's safety, rights and best interests.
- Education and Care Services National Regulations, including regulation 82 (tobacco, drug and alcohol-free environment) and regulation 83 (staff not affected by alcohol or drugs), and applicable supervision and safety requirements.
- Smoke-free Environment Act 2000 (NSW) and applicable smoke-free regulations and NSW Health guidance, including rules for public building entrances and other smoke-free public places.
- Work Health and Safety Act 2011 (NSW); National Quality Standard, particularly Quality Areas 2, 4 and 7.
- My Time, Our Place V2.0 and Early Years Learning Framework V2.0, as relevant to the education and care provided.

SOURCES

- ACECQA – Guide to the National Quality Framework and National Regulations.
- NSW Health – Smoke-free laws in NSW and e-cigarette/vaping guidance.
- NSW Poisons Information Centre – poisoning first aid advice.
- Cancer Council Australia – second-hand smoke and vaping information.

4.11 Drug, Alcohol & Substance Impairment Policy

INTRODUCTION

Alcohol, illicit drugs, some prescription and non-prescription medicines, and other substances can impair judgement, alertness, coordination and safe decision-making. Cubby OOSH is committed to a safe, respectful and supportive education and care environment across its before school care, after school care, vacation care and long day care operations.

PURPOSE

To prevent substance-related harm, ensure staff are fit to perform their duties safely, establish a fair response to suspected impairment, and protect children, families, employees and visitors.

SCOPE

This policy applies to all employees, management, Nominated Supervisors, Responsible Persons, contractors, volunteers, students and visitors while on service premises or undertaking service-related duties, including excursions, transport and off-site activities. The same expectations apply across Cubby services, with risk controls tailored to children's ages, needs and activities.

PARAMOUNT CONSIDERATION AND LEGAL REQUIREMENTS

Children's safety, rights and best interests are the paramount consideration in all education and care decisions. Under Regulations 82 and 83, the approved provider must ensure a tobacco-, drug- and alcohol-free environment and must ensure staff members and volunteers are not affected by alcohol or drugs (including prescription medication) so as to impair their capacity to supervise or provide education and care. The duty relates to impairment, not simply whether a medicine is legally prescribed.

SUBSTANCE-FREE ENVIRONMENT

- Alcohol and illicit drugs must not be consumed, supplied or used on service premises, in service vehicles or while supervising or caring for children, including during excursions and transport.
- Smoking and vaping are managed under Policy 4.10 and must not occur in prohibited areas or while directly responsible for children.
- Medicines legitimately required by a staff member may be carried or stored securely in accordance with service arrangements; they must never be accessible to children.
- Alcohol must not be consumed during paid work duties or during breaks where the employee remains responsible for children or is required to resume duties while affected.

FITNESS FOR WORK AND MEDICATION

- Employees must arrive fit for duty and remain able to supervise, respond to emergencies, drive where authorised and perform their responsibilities safely.
- An employee taking prescription or over-the-counter medication should inform the Nominated Supervisor or management if it may affect safe performance (for example, drowsiness, dizziness or reduced alertness). They need not routinely disclose a diagnosis or unrelated private medical information.

- Management will assess the functional safety risk confidentially and consider reasonable adjustments, alternative duties, temporary removal from child-facing work or leave where necessary.
- Where reasonably necessary, management may seek medical information about fitness for specified duties, with appropriate consent and privacy safeguards. A blanket medical clearance requirement is not automatic.
- Staff must not share, administer or leave their personal medicines accessible to children.

RECOGNISING AND RESPONDING TO SUSPECTED IMPAIRMENT

- Where observable behaviour creates a reasonable concern (for example, unsteady movement, slowed reactions, unsafe decisions or inability to supervise), the Responsible Person must immediately protect children by arranging safe relief and adequate supervision.
- Discuss concerns privately and respectfully with the employee, describe observable facts rather than making assumptions about substance use, and notify management.
- Do not allow a potentially impaired person to supervise children, drive a service vehicle or undertake safety-critical tasks while the risk remains unresolved.
- Document factual observations, actions taken, staffing changes and relevant communications. Arrange safe transport home or medical assistance if appropriate; do not direct an impaired employee to drive.
- If there is a medical emergency, serious behavioural threat or immediate danger, call 000 and follow incident and emergency procedures.
- Management will assess whether a serious incident, child protection concern or other statutory notification is required.

DRUG AND ALCOHOL TESTING

Testing is not automatic or random merely because a manager suspects impairment. Any testing must have a lawful and reasonable basis, be proportionate to the risk, follow an applicable workplace policy, contract or lawful direction, and protect privacy, procedural fairness and relevant industrial rights. Results must be interpreted appropriately; a positive result does not always establish impairment at the time of work. Refusal to participate must be assessed in context and does not result in automatic dismissal.

FAMILIES, VISITORS AND OTHER ADULTS

If a parent, collector, visitor or contractor appears affected by alcohol or drugs and may present a safety risk, educators must prioritise children's safety, seek support from the Responsible Person, and apply the Arrival and Departure, Child Safe Environment and Child Protection policies. Seek a safe alternative collector where appropriate; do not physically confront a person. Contact Police where there is immediate danger or suspected unlawful removal. Record the incident objectively.

SUPPORT, CONFIDENTIALITY AND FAIR EMPLOYMENT PROCESSES

- Cubby will respond to safety concerns promptly and without stigma, and may provide information about employee assistance, counselling or other support.
- Medical and testing information must be limited to those who reasonably need it and handled in accordance with applicable privacy and records requirements.

- Any investigation or disciplinary process will consider evidence, seriousness, previous conduct, mitigating circumstances, legal duties and procedural fairness. Outcomes may include support, training, warnings, reassignment or termination where justified; there is no automatic dismissal rule.
- Employees may raise safety concerns or seek assistance without retaliation.

ROLES AND RESPONSIBILITIES

- Approved Provider/management: maintain safe systems, staff coverage, risk assessment, lawful employment procedures, confidential records and required regulatory notifications.
- Nominated Supervisor/Responsible Person: identify and act on immediate risks, ensure adequate supervision, arrange relief, escalate concerns and document actions.
- Employees, volunteers and contractors: remain fit for duty, disclose functional impairment risks, follow lawful safety directions and report hazards or concerns promptly.

STATUTORY LEGISLATION & CONSIDERATIONS

- Education and Care Services National Law as applied in NSW, including section 167 and the paramount consideration of children's safety, rights and best interests.
- Education and Care Services National Regulations, particularly Regulations 82 and 83, and applicable policies, supervision and incident requirements.
- Work Health and Safety Act 2011 (NSW) and relevant WHS regulations.
- National Quality Standard: Quality Areas 2, 4 and 7.
- Fair Work Act 2009 (Cth), applicable awards, anti-discrimination and privacy laws, and relevant NSW drug, alcohol and smoke-free laws.

SOURCES

- ACECQA – Guide to the National Quality Framework and Quality Area 2 guidance.
- Safe Work Australia – Alcohol and drugs at work and fitness for work guidance.
- NSW Early Learning Commission – child safety and regulatory guidance.
- Fair Work Ombudsman – workplace rights, policies and disciplinary processes.

4.12 Confidentiality of Records Policy

INTRODUCTION

Cubby OOSH respects the privacy, dignity and rights of children, families, educators, employees, volunteers and other people whose information is held by its education and care services. Appropriate collection, use, sharing, storage and retention of information support child safety, trust, lawful operations and accountable governance.

PURPOSE

To establish consistent, secure and lawful management of personal, sensitive, health, educational, employment and child protection records across Cubby education and care services, while allowing necessary information sharing for the safety, rights and best interests of children.

SCOPE

This policy applies to the Approved Provider, management, Nominated Supervisors, Responsible Persons, educators, staff, contractors, students and volunteers. It applies across before school care, after school care, vacation care and Cubby long day care services. The same confidentiality safeguards apply, while the records required, documentation frameworks and statutory retention periods may differ by service type and child age.

PARAMOUNT CONSIDERATION AND SAFEGUARDING

Children's safety, rights and best interests are the paramount consideration in decisions about their information. Confidentiality must not be used to prevent or delay lawful child protection reports, mandatory notifications, emergency disclosures or appropriate information sharing to protect a child. Information must only be shared with people who need it or are legally authorised to receive it, and disclosures should be proportionate, accurate and recorded where appropriate.

COLLECTION AND PRIVACY NOTICES

- Collect only information reasonably necessary for enrolment, care, education, safety, staffing, regulatory compliance, payment, Child Care Subsidy or other lawful functions.
- Explain why information is collected, how it is used and disclosed, how to seek access or correction, and how to make a privacy complaint; provide a current privacy notice when required.
- Collect health, disability, child protection, court-order and other sensitive information carefully, with appropriate consent or another lawful basis.
- Obtain information directly from the person or authorised representative where practicable; verify identity and authority before requesting or disclosing records.
- Keep enrolment and emergency contact details current and invite families to notify the service promptly of changes.

ACCESS, USE AND DISCLOSURE

- Use role-based access so educators can see information needed for safe care, such as medical action plans, authorised collection arrangements, allergies, behaviour supports and relevant court orders.
- Do not access records out of curiosity, discuss confidential matters in public spaces or disclose information to unauthorised colleagues, families or third parties.

- Share information with schools, allied health providers and other services only with appropriate authority or where legally permitted or required; document significant disclosures.
- Respond to lawful requests from the NSW Early Learning Commission, child protection authorities, Police, courts and other authorised agencies, verifying the request and disclosing only what is required.
- A parent's access request must be considered against identity, parental responsibility, court orders, other people's privacy, child safety and applicable legal restrictions; do not automatically release all records to any requester.
- Respect children's increasing maturity and privacy, including when discussing sensitive personal or wellbeing matters.

CHILD PROTECTION AND INFORMATION SHARING

Where there are concerns about abuse, neglect, harm or a reportable allegation, staff must follow Cubby child protection procedures and applicable NSW reporting and information-sharing laws. Staff must not promise absolute secrecy to a child. Records must be factual, dated, objective and securely maintained. Relevant child protection concerns may be disclosed without consent where required or authorised by law; internal permission is not a substitute for a personal statutory reporting duty.

RECORD ACCURACY AND DOCUMENTATION

- Record facts objectively, promptly and respectfully; avoid speculation, biased descriptions or unnecessary sensitive details.
- Correct inaccurate information using an auditable process; do not secretly delete or overwrite records that must be retained.
- OOSH learning documentation will be guided by My Time, Our Place V2.0; long day care documentation will be guided by EYLF V2.0, with the same privacy expectations.
- Keep attendance, enrolment, medical, incident, child protection, staffing and other prescribed records complete and available when required by law.

DIGITAL SECURITY AND DEVICES

- Use only approved service systems, including OWNA where implemented, for service records; avoid naming a single software provider as the only permissible system.
- Use individual accounts, strong passwords, multi-factor authentication where available, access controls, backups and prompt removal of access when a person changes roles or leaves.
- Do not share logins, store confidential service records on personal devices or use unapproved email, messaging, cloud storage or social media for sensitive information.
- Images and videos of children must be captured, stored and transmitted only through service-supplied devices and approved systems, subject to current National Law requirements and lawful authorisations.
- Immediately report lost devices, misdirected messages, suspected unauthorised access, cyber incidents and privacy breaches to management; contain, assess, document and notify affected people or regulators where legally required.

PAPER RECORDS AND CONFIDENTIAL CONVERSATIONS

- Store paper files in secure locations with access limited to authorised personnel; do not leave enrolment, medical or employment files visible to visitors.

- Conduct sensitive discussions privately and avoid discussing children, families or staff where others may overhear.
- Use secure methods for transporting or transferring records and confirm the intended recipient before sending.
- Dispose of eligible records using secure shredding or an approved confidential destruction service, never ordinary rubbish.

RETENTION AND DISPOSAL

Records must be retained for the specific periods required by the Education and Care Services National Regulations, Family Assistance Law, employment, taxation, child protection and other applicable legislation. Different records have different retention periods; some child-related records require very long retention. No record may be destroyed merely because an enrolment ends or an employee leaves. Where litigation, investigation, complaint or a legal hold is reasonably anticipated, relevant records must be preserved. At the end of the lawful retention period, information will be securely destroyed or de-identified where appropriate and disposal recorded.

EMPLOYEE, APPLICANT, STUDENT AND VOLUNTEER INFORMATION

- Keep personnel and recruitment records securely with access restricted to authorised management and staff with legitimate responsibilities.
- Inform applicants how recruitment information will be used and retained; undertake reference checks with appropriate notice and authority.
- Do not assume that all employee information is subject to identical Privacy Act rules; comply with applicable employment, workplace, privacy and record-keeping obligations.
- Students and volunteers must not use identifying service information in assignments, presentations or personal communications without appropriate approval and lawful authority.

ACCESS, CORRECTION AND PRIVACY COMPLAINTS

Requests for access or correction should be made to the Approved Provider or delegated manager. The service will verify the applicant's identity and authority, consider applicable legal exceptions and respond within the timeframe required by law. A refusal will be explained where appropriate and any available review pathway identified. Privacy complaints will be documented, investigated fairly and responded to promptly. Where applicable, individuals may complain to the Office of the Australian Information Commissioner (OAIC), www.oaic.gov.au.

RESPONSIBILITIES

- Approved Provider and management: maintain compliant systems, training, access permissions, retention schedules, privacy notices and breach response procedures.
- Nominated Supervisor/Responsible Person: ensure safe day-to-day handling, appropriate staff access, confidential communications and prompt escalation of concerns.
- Educators, staff, students and volunteers: access only information needed for their role, protect confidentiality, follow reporting duties and immediately report privacy or security incidents.
- Families: provide accurate information, notify relevant changes and respect the confidentiality of other children and families.

STATUTORY LEGISLATION & CONSIDERATIONS

Education and Care Services National Law as applied in NSW, including section 273 (confidentiality) and the paramount consideration of children's safety, rights and best interests; Education and Care Services National Regulations, including regulations 158–162, 168, 177–184 and other relevant record provisions; National Quality Standard QA2, QA4 and QA7; Privacy Act 1988 (Cth) and Australian Privacy Principles where applicable; Notifiable Data Breaches scheme where applicable; Family Assistance Law and Child Care Subsidy record requirements; applicable NSW child protection, information-sharing, employment and record-retention laws.

SOURCES

ACECQA – Guide to the National Quality Framework and records/confidentiality guidance; Office of the Australian Information Commissioner – Australian Privacy Principles, access and correction, and Notifiable Data Breaches guidance; NSW Early Learning Commission – child safety and regulatory guidance; Australian Government Department of Education – Child Care Provider Handbook.

4.13 Social Media Policy

INTRODUCTION

Social media and online communication can support engagement with families and communities, but they also create risks to children's privacy, safety, dignity and confidential service information. Cubby OOSH expects responsible online conduct across its education and care services.

PURPOSE

To establish clear requirements for official and personal social media, digital communication, images and information sharing while protecting children, families, educators and the service. The policy applies to before school care, after school care, vacation care and long day care without separating services unnecessarily.

SCOPE

Applies to the Approved Provider, management, Nominated Supervisors, Responsible Persons, educators, staff, contractors, volunteers and students. Families and visitors are asked to follow the service's privacy and photography expectations when on site or at service events.

PARAMOUNT CONSIDERATION AND CHILD SAFE ONLINE PRACTICE

The safety, rights and best interests of children are the paramount consideration in decisions about taking, using, sharing, storing or publishing children's information and images. A marketing benefit, social media engagement or adult preference must never override a child's safety, dignity or privacy. Respect children's views and wishes in age-appropriate ways, even where a parent has authorised an image.

OFFICIAL CUBBY SOCIAL MEDIA ACCOUNTS

- Only personnel authorised by management/marketing may create, administer, publish to or respond on official Cubby social media accounts. Unauthorised centre-specific accounts are prohibited.
- Before publishing any child's identifiable image, video, name, voice or personal information, verify current, specific parent/guardian authorisation and any relevant court order, safety restriction or withdrawal of consent.
- Use approved service channels and service-supplied devices for images and communications. Check backgrounds, uniforms, location information, name tags and other identifiers before posting.
- Never post sensitive health, disability, behaviour, child protection, family circumstances, incident or attendance information about a child.
- Use approved content moderation, account access controls, strong passwords and multi-factor authentication where available. Promptly remove or restrict unsafe or unauthorised content and report concerns.
- Ensure copyright, licensing and attribution requirements are met for photographs, music, videos and third-party content.

PERSONAL SOCIAL MEDIA AND PROFESSIONAL BOUNDARIES

- Staff must not post or share photographs, videos, recordings, names or identifying information of children from the service on personal accounts, private groups, messaging apps or gaming platforms.

- Do not contact children through personal social media, direct messages or gaming accounts, or accept private social media connections with children in care.
- Do not share confidential family, employee, child or operational information, including screenshots from OWNA, group chats or service systems.
- Do not use personal social media to bully, harass, threaten, discriminate against or victimise children, families or colleagues.
- Personal opinions must not be represented as official Cubby statements. Staff retain lawful rights to discuss workplace conditions, make protected disclosures, seek advice or raise concerns with regulators or relevant authorities.
- Staff should seek consent before tagging or publishing identifiable images of colleagues; requests not to feature in promotional posts will be respected.

PERSONAL DEVICES AND PHOTOGRAPHY

Staff must comply with the strengthened National Law requirements for personal image-capable devices while working directly with children in centre-based education and care. Personal mobile phones, smartwatches and other image-capable devices must be stored away unless a prescribed exception applies and any required written authorisation is in place. Informal permission from a Nominated Supervisor alone does not override statutory restrictions.

- Only service-supplied devices may be used to capture, store or transmit images of children for service purposes. A permitted personal-device exception does not authorise capturing children's images on a personal device.
- Service-supplied devices must not be used for personal social media, private messaging or unauthorised accounts.
- Report accidental capture, lost devices, inappropriate images or suspected breaches immediately; preserve evidence appropriately and do not forward concerning images.
- Use service-approved communication systems for operational contact, school transitions and emergencies; manage excursion and transport exceptions in accordance with law and the relevant risk assessment.

CHILDREN'S USE OF DIGITAL MEDIA AND SOCIAL PLATFORMS

Children's use of technology will be supervised, age-appropriate and guided by Cubby's online safety and digital technology policies. OOSH children may participate in appropriately selected digital leisure experiences, including movies, games and creative activities, where safely supervised and consistent with the program; there is no universal one-hour limit imposed by this social media policy. Long day care practice must be developmentally appropriate for younger children.

- Educators will teach safe, respectful online behaviour, privacy, consent and how to seek help.
- Children's communication and accessibility devices will be accommodated through individual plans and reasonable adjustments. Do not confiscate essential communication or assistive technology as a routine response.
- Staff must not search, delete content from or remove SIM cards from a child's personal device without lawful authority and a documented safeguarding basis. Seek management/family support and follow incident or child protection procedures if unsafe content is identified.

- Access to social media services must comply with applicable Australian age restrictions, platform rules and service safeguarding controls.

FAMILIES, VISITORS AND SERVICE EVENTS

Families and visitors must not publish or share images identifying other children without appropriate permission. Educators will remind visitors of photography restrictions at events and take reasonable steps to prevent unauthorised recording. Any concern involving court orders, family violence, location disclosure or child protection will be escalated promptly and handled sensitively.

PRIVACY, BREACHES AND REPORTING

- Suspected unauthorised disclosure, harmful posts, impersonation, cyberbullying, online grooming or image misuse must be reported promptly to the Nominated Supervisor or management, unless implicated; then report to the Approved Provider or appropriate external authority.
- Where a child may be at risk, follow child protection, reportable conduct and NSW Early Learning Commission notification processes, including contacting Police on 000 for immediate danger.
- Management will contain breaches, preserve relevant evidence securely, assess privacy and mandatory notification obligations, remove content where appropriate and document corrective actions.
- Staff and families may raise concerns through the complaints process. Reporting to Police, child protection authorities, the regulator or other lawful bodies must not be obstructed.

BREACHES OF THIS POLICY

Breaches will be managed proportionately with child safety as the priority. Actions may include removal of content, retraining, access restrictions, investigation, formal disciplinary action or referral to authorities. Serious misconduct may lead to termination following lawful and fair processes; dismissal is not automatic for every breach.

STATUTORY LEGISLATION & CONSIDERATIONS

- Education and Care Services National Law (NSW), including the paramount consideration of children's safety, rights and best interests and strengthened digital device and image safeguards.
- Education and Care Services National Regulations (NSW), including requirements for child safe environments, digital technology and online safety policies, authorisations, records and confidentiality.
- National Quality Standard – Quality Areas 2, 4 and 7.
- Privacy Act 1988 (Cth) and Australian Privacy Principles where applicable; NSW child protection and reportable conduct legislation; applicable copyright, online safety and workplace laws.
- My Time, Our Place V2.0 and Early Years Learning Framework V2.0, as appropriate to the children and service.

SOURCES

- ACECQA – Guide to the National Quality Framework and strengthened child safety/digital technology guidance.
- NSW Early Learning Commission – child safety reforms and online safety guidance.
- eSafety Commissioner – online safety and image-based abuse resources.
- Office of the Australian Information Commissioner – privacy and data breach guidance.
- Early Childhood Australia – Code of Ethics.

4.14 Work Health & Safety Policy

INTRODUCTION

Cubby OOSH is committed to safe, healthy and inclusive education and care environments for children, workers, families, contractors and visitors. Work health and safety (WHS) is a shared responsibility supported by proactive risk management, consultation, training and continuous improvement.

PURPOSE

To prevent work-related injury and illness, meet NSW WHS and education and care obligations, provide effective hazard and incident management, and support injured workers to recover and return to suitable work. Children's safety, rights and best interests are the paramount consideration in decisions affecting their education and care.

SCOPE

This policy applies to all Cubby education and care services, including before school care, after school care, vacation care and long day care, and to the Approved Provider, management, educators, employees, students, volunteers, contractors and visitors as relevant. Each service must implement controls appropriate to the ages of children, premises, activities, staffing and foreseeable risks.

RESPONSIBILITIES AND CONSULTATION

- The Approved Provider and management will provide safe systems of work, facilities, resources, equipment, training, supervision and processes for consultation, risk assessment and incident response.
- Nominated Supervisors and Responsible Persons will implement daily safety systems, ensure adequate supervision and staffing, act on hazards and escalate unresolved risks.
- Workers must take reasonable care of their own safety and that of others, follow reasonable safety instructions, use equipment safely and promptly report hazards, incidents and near misses.
- Cubby will consult with workers and any elected health and safety representatives (HSRs) about hazards, proposed changes, controls and WHS decisions. An HSR is not automatically required or appointed at every service; any election, powers and training will follow NSW WHS law.
- Contractors, volunteers, families and visitors must follow relevant site safety instructions and promptly advise staff of hazards.

PARAMOUNTCY AND SAFE SERVICE OPERATION

When a WHS decision also affects children, their safety, rights and best interests must be the paramount consideration. Financial or staffing convenience must not override adequate supervision, safe arrival and departure, child protection, medical support or emergency arrangements. Worker safety must also be protected through appropriate planning, controls and support.

INDUCTION, TRAINING AND COMMUNICATION

- Provide role-specific WHS induction before independent duties, including site hazards, supervision, emergency procedures, incident reporting, first aid, infection control, manual handling, chemical safety and child-safe practices.
- Provide accessible refresher training when hazards, duties, legislation or procedures change, and record relevant completion.

- Communicate risks and controls to relief educators, contractors, students and volunteers before work begins; include site-specific handovers.
- Discuss WHS matters at team meetings and through practical consultation; workers may raise concerns without retaliation.

HAZARD IDENTIFICATION AND RISK MANAGEMENT

- Complete opening, closing and daily safety checks, and conduct documented periodic inspections and service-specific risk assessments.
- Identify physical, biological, chemical, ergonomic and psychosocial hazards, including slips/trips, outdoor equipment, weather, excursions, vehicles, infection, aggressive behaviour, workload, bullying and fatigue.
- Apply the hierarchy of controls: eliminate hazards where reasonably practicable, then substitute, isolate or use engineering controls, administrative controls and suitable personal protective equipment.
- Assess and document risks before excursions, transport, significant changes, new equipment or high-risk activities; involve workers and review controls after incidents or changed circumstances.
- Remove unsafe equipment from use, isolate hazards and escalate repairs or urgent controls promptly. Keep evidence of corrective actions and review effectiveness.

SUPERVISION, STAFFING AND SAFE TRANSITIONS

Staffing decisions must meet applicable educator-to-child ratios, qualifications and adequate supervision requirements. Risk-based additional staffing may be needed during school transitions, excursions, transport, toileting, sleep and rest, water activities or when children need individual support. Children must be accounted for using approved attendance and safe-arrival procedures.

PSYCHOSOCIAL HEALTH AND WELLBEING

- Identify and manage psychosocial risks such as excessive workload, poor role clarity, fatigue, aggression, bullying, harassment, inadequate support and exposure to distressing events.
- Consult with workers, implement practical controls, support respectful communication and promptly respond to reports.
- Provide confidential support and appropriate adjustments where reasonably practicable; protect personal health information.

INCIDENTS, INJURIES, NEAR MISSES AND NOTIFICATIONS

- Provide immediate first aid and emergency response; call 000 when required and ensure children remain safely supervised.
- Record incidents, injuries, illnesses and near misses promptly and objectively using approved systems; notify management without delay.
- Assess whether an incident is notifiable to SafeWork NSW under WHS law and/or to the NSW Early Learning Commission under education and care law; these are separate notification pathways with different tests and timeframes.
- For a WHS notifiable incident, notify SafeWork NSW immediately when legally required and preserve the incident site so far as the law requires, subject to rescuing people and making the site safe.

- Investigate causes, consult workers, document corrective actions and verify controls; protect privacy and avoid blame-based reporting.

FIRST AID, EMERGENCY MANAGEMENT AND DRILLS

- Maintain appropriately stocked, accessible first aid equipment and required trained personnel, including education and care first aid qualifications as applicable.
- Maintain and rehearse service-specific emergency, evacuation and lockdown procedures, including required drills and records under the National Regulations.
- Plan for bushfire, severe weather, heat, medical emergencies, hazardous substances, security incidents and safe reunification with families.
- Ensure emergency equipment, contact information and evacuation arrangements remain accessible and appropriate for children and workers with additional needs.

CHEMICALS, EQUIPMENT AND MANUAL HANDLING

- Maintain a current register of hazardous chemicals where required, accessible Safety Data Sheets (SDS), suitable labelling and secure storage away from children.
- Use cleaning chemicals only as directed; never mix incompatible products and provide suitable ventilation and PPE.
- Inspect, maintain and where required test electrical equipment, playground equipment, furniture, vehicles and other work equipment.
- Use safe manual handling and ergonomic practices; provide training, aids and team assistance where appropriate, including lifting or supporting younger children.

INFECTION PREVENTION AND ENVIRONMENTAL HEALTH

Follow service infection control, hand hygiene, food safety, cleaning, exclusion, bodily fluid, ventilation and outbreak procedures. Maintain drinking water, safe temperatures, shade, sun protection, toilets and hygienic facilities appropriate to each service. Apply age-appropriate controls, including safe sleep and rest arrangements where relevant.

WORKPLACE INSPECTIONS AND AUDITS

Each service will complete daily opening/closing checks and scheduled documented inspections. Management will monitor the Centre Self-Assessment Checklist, incident and near-miss trends, first aid supplies, chemical storage/SDS, maintenance actions and emergency drill records. Audit frequency will follow law, risk and Cubby procedures; the original monthly self-assessment and quarterly supply/chemical review may be retained as internal minimum schedules where appropriate, but must not replace any more frequent legal requirement.

INJURY MANAGEMENT AND RETURN TO WORK

Cubby will respond promptly to work-related injury, provide required workers compensation and injury management information, meet NSW return-to-work obligations and consult with the injured worker and relevant treating professionals as appropriate. Suitable duties and adjustments will be considered consistent with medical capacity, privacy, operational safety and legal requirements.

MONITORING, REVIEW AND RECORD KEEPING

The Approved Provider and management will monitor compliance, investigate trends, consult workers and review this policy at least annually and following significant incidents, regulatory changes or identified control failures. Records will be accurate, securely stored and retained for applicable statutory periods.

STATUTORY LEGISLATION & CONSIDERATIONS

- Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2017 (NSW), including consultation, risk management, incident notification and psychosocial risk requirements.
- Workers Compensation Act 1987 (NSW) and Workplace Injury Management and Workers Compensation Act 1998 (NSW), where applicable.
- Education and Care Services National Law as applied in NSW, including protection from harm and hazards and paramount consideration of children's safety, rights and best interests.
- Education and Care Services National Regulations (NSW), including requirements for supervision, emergency procedures, risk assessments, first aid, premises, equipment and required policies, as applicable.
- National Quality Standard: Quality Areas 2, 3, 4 and 7.

SOURCES

- SafeWork NSW – WHS laws, consultation, managing risks, psychosocial hazards and incident notification.
- Safe Work Australia – Model Code of Practice: How to Manage Work Health and Safety Risks.
- ACECQA – Guide to the National Quality Framework and child safety/paramountcy guidance.
- NSW State Insurance Regulatory Authority (SIRA) – injury management and return-to-work guidance.

4.15 Educators Lifting & Bending Policy

INTRODUCTION

Hazardous manual tasks include lifting, lowering, pushing, pulling, carrying, holding, moving or supporting people and objects, particularly where force, repetition, awkward posture or vibration creates a risk of musculoskeletal injury. At Cubby OOSH and our other education and care services, safe work design and risk controls are more effective than relying on a single “correct lifting technique”.

PURPOSE

To prevent injury to educators, children, volunteers and others by identifying and controlling hazardous manual task risks, providing suitable equipment and training, and ensuring children are handled safely, respectfully and only when necessary.

SCOPE

This policy applies to management, educators, staff, volunteers, students and contractors undertaking manual tasks at Cubby education and care services, including OOSH and long day care. Risks and controls must reflect the ages, needs, environments and activities of each service.

CHILD SAFETY AND PARAMOUNTCY

Where lifting, assisting, moving or supporting a child is necessary, the child’s safety, rights, dignity and best interests are the paramount consideration. Educators must explain actions in age-appropriate ways, seek the child’s cooperation where possible, preserve privacy and use the least intrusive safe approach. A child must never be forcibly lifted or moved as punishment or for staff convenience. Immediate emergencies and authorised, necessary protective intervention must be managed under relevant safeguarding and behaviour guidance procedures.

IMPLEMENTATION — RISK MANAGEMENT

- Identify hazardous tasks during daily operations, inspections, incident reviews and consultation with educators, including repetitive bending, setting up furniture, carrying supplies, moving equipment, cleaning and assisting children.
- Assess risk factors such as load, frequency, duration, posture, reach, floor conditions, work height, space, individual capability and children’s unpredictable movement.
- Apply the hierarchy of controls: eliminate unnecessary lifting where possible; redesign tasks and spaces; use trolleys, height-adjustable equipment and other suitable aids; organise team assistance and safe procedures.
- Do not assume a two-person lift is safe without assessing the task, space, coordination and equipment. Seek specialist manual handling or allied health advice for complex child transfers.
- Review controls when tasks, equipment, child needs or environments change, and after injuries, near misses or concerns.

SAFE LIFTING AND MOVING OF EQUIPMENT

- Plan the movement, check the path and destination, and remove trip hazards before starting.

- Use a trolley or other suitable aid for bulky, heavy or awkward loads rather than carrying where reasonably practicable.
- Position close to the load, keep it stable and within a comfortable reach, avoid sudden twisting and change direction by moving the feet.
- Avoid sustained stooping, overhead lifting and repetitive awkward positions; divide loads or alternate tasks where practicable.
- Do not attempt a lift that feels unsafe or beyond your capacity. Stop, secure the area and request assistance.
- Store frequently used and heavier items at practical heights and ensure shelving and equipment are stable.

ASSISTING AND LIFTING CHILDREN

- Support children to move independently when safe and developmentally appropriate; use verbal prompts, steps, accessible furniture and hand support rather than lifting unnecessarily.
- Before lifting or transferring a child, consider their size, mobility, medical and disability-related needs, distress, the environment and whether a documented support plan or equipment is required.
- Where a lift is necessary and safe, prepare the space, establish stable footing, hold the child securely and close to the body, avoid twisting and use a controlled movement. Do not lift a struggling child if the movement is unsafe; seek support and follow the child's individual plan.
- For children requiring regular physical assistance, work with the family and relevant health professionals to establish a documented safe handling plan, equipment, training and suitable staffing.
- In long day care, consider frequent cot, highchair, nappy change and toddler transfers, with safe change facilities, steps and age-appropriate equipment. In OOSH, prioritise independence and safe support during play, excursions and inclusion activities.
- Never lift a child by one arm, wrist or hand, or swing or pull a child by their limbs.

BENDING, CROUCHING AND FLOOR-LEVEL WORK

- Adjust the task or work height where possible rather than repeatedly bending from the waist.
- Use a comfortable supported squat, kneel or other stable posture as appropriate, and change position regularly; avoid prolonged static postures.
- Use suitable adult-sized chairs, low stools or adjustable workstations for floor activities, supervision, craft and documentation.
- Keep pathways clear and avoid carrying items while navigating crowded or slippery areas.

TRAINING, CONSULTATION AND RESPONSIBILITIES

- The Approved Provider and management will provide safe systems of work, equipment, suitable staffing, risk assessments, consultation and information, instruction and training proportionate to identified risks.
- Nominated Supervisors and Responsible Persons will identify service-specific hazards, ensure controls are followed, support educators and escalate unresolved risks.

- Educators and other workers must follow safe procedures, use equipment appropriately, report hazards and near misses promptly, and seek assistance before undertaking unsafe tasks.
- Where a health and safety representative is elected, consultation will occur in accordance with NSW WHS legislation; responsibility for WHS does not depend on having a designated WHS officer.
- New and relief staff will receive task-specific induction, including child assistance and any individual handling plans.

INCIDENTS, INJURY AND RETURN TO WORK

Immediately make the area safe, provide first aid and obtain medical assistance where needed. Report injuries, hazardous manual task concerns and near misses through the service incident/WHS process. Management will investigate contributing factors, review controls and assess whether SafeWork NSW notification, workers compensation or other reporting is required. Support injured workers through lawful injury management, suitable duties and return-to-work processes; do not require unsafe tasks during recovery.

STATUTORY LEGISLATION & CONSIDERATIONS

- Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2017 (NSW), including hazardous manual tasks and consultation obligations.
- Safe Work Australia – Hazardous Manual Tasks Code of Practice; SafeWork NSW guidance.
- Education and Care Services National Law as applied in NSW, including the paramount consideration of children's safety, rights and best interests.
- Education and Care Services National Regulations (NSW), and National Quality Standard Quality Areas 2, 3 and 4, as applicable.
- Disability Discrimination Act 1992 (Cth) and relevant reasonable adjustment obligations where applicable.

SOURCES

- Safe Work Australia – Hazardous Manual Tasks Code of Practice (www.safeworkaustralia.gov.au).
- SafeWork NSW – Hazardous manual tasks guidance (www.safework.nsw.gov.au).
- ACECQA – Guide to the National Quality Framework (www.acecqa.gov.au).

4.16 Educator Review & Appraisal Policy

INTRODUCTION

Regular, fair and constructive performance conversations support high-quality education and care, professional growth, staff wellbeing and a child safe culture across Cubby OOSH services. Reviews recognise achievements, identify support and training needs, and strengthen accountability and continuous improvement.

PURPOSE

To provide a consistent, respectful and evidence-informed process for educator review, feedback, appraisal and professional development that supports service quality and each team member's role.

SCOPE

This policy applies to educators and relevant staff across Cubby education and care services, including before school care, after school care, vacation care and long day care. Expectations are applied according to each role, employment arrangements, children's ages and applicable learning framework: My Time, Our Place V2.0 for school-age care and the Early Years Learning Framework V2.0 for early childhood care.

PRINCIPLES

- Children's safety, rights and best interests are the paramount consideration when reviewing practice or addressing performance that may affect children.
- Appraisals are supportive, objective, inclusive, confidential and based on reasonable role expectations and observable evidence.
- Feedback is two-way: educators can reflect, respond, identify strengths, seek clarification and contribute to professional goals.
- Reviews must not discriminate, victimise or penalise employees for lawful workplace rights, disability, family responsibilities or raising genuine safety concerns.
- A routine appraisal does not replace immediate action required for a child protection concern, serious misconduct or urgent safety risk.

REVIEW CYCLE AND PREPARATION

- A formal performance appraisal will ordinarily occur at least once every 12 months, with a developmental check-in approximately six months after or between formal reviews. Additional reviews may occur during probation, role changes or where support is needed.
- Educators will ordinarily receive at least two weeks' notice of a planned formal appraisal and an opportunity to complete a self-evaluation.
- The Nominated Supervisor, relevant manager or authorised delegate will arrange a suitable, private meeting, with reasonable adjustments where needed.
- New, casual and relief educators will receive feedback proportionate to their engagement and role, including early check-ins and service-specific expectations.
- The reviewer will consider the position description, previous goals, training, reflective practice, documented feedback and relevant service quality evidence.

APPRAISAL DISCUSSION

- Recognise strengths, achievements, contributions to teamwork and relationships with children, families and colleagues.
- Discuss professional conduct, child safety, adequate supervision, safe arrival and transitions, inclusion, positive guidance, documentation and policy implementation as relevant to the role.
- Consider educational practice, child agency, play and leisure in OOSH, age-appropriate care and learning in long day care, and relevant approved learning frameworks.
- Discuss wellbeing, workload, access to resources, professional support and opportunities for leadership or career development.
- Agree on specific, achievable goals, training, resources, responsibilities and review dates.
- Allow the educator to respond to feedback and record any differing view respectfully.

PERFORMANCE DEVELOPMENT PLAN

Where appropriate, the educator and reviewer will develop a written plan recording identified strengths, goals, agreed actions, support or training, realistic timeframes and how progress will be reviewed. The plan should focus on improvement and be revisited at agreed check-ins. An employee's signature acknowledges receipt and discussion, not necessarily agreement; a refusal to sign will be documented without automatically treating it as misconduct.

PERFORMANCE CONCERNS AND SUPPORT

- Concerns should be explained clearly with specific examples, reference to role expectations and an opportunity for the educator to respond.
- Management will consider whether workload, induction, resources, supervision, training, disability-related adjustments or other reasonable supports contributed to the concern.
- Where suitable, implement a documented performance improvement plan identifying the required standard, support, training, review timeframe and consequences if improvement is not achieved.
- Conduct follow-up meetings, provide practical feedback and keep objective records.
- Where improvement is insufficient, management may consider further support or fair disciplinary processes in accordance with applicable employment law and Cubby policies.
- Serious misconduct, immediate risk to children or a child protection allegation may require urgent protective action and statutory reporting; these matters must not wait for a routine appraisal.

EDUCATOR CONCERNS AND REVIEW OF OUTCOMES

An educator who disagrees with an appraisal may provide a written response and request review by a more senior manager or the Approved Provider. Educators may seek advice or representation, including from a support person or union representative where applicable, and access lawful external avenues. Raising a concern in good faith must not result in retaliation.

ROLES AND RESPONSIBILITIES

- Approved Provider and management: maintain fair systems, allocate resources for professional development, monitor child safe performance expectations and protect confidential records.
- Nominated Supervisors and reviewers: give timely feedback, prepare objectively, conduct respectful reviews, agree practical goals and follow through on support and actions.

- Educational Leaders: contribute relevant professional guidance and mentoring, without assuming responsibility for employment decisions unless authorised.
- Educators: participate constructively, reflect on practice, complete agreed actions, seek support and promptly report risks or concerns.

CONFIDENTIALITY AND RECORDS

Performance documents, self-assessments, plans and meeting notes will be stored securely in approved personnel systems, accessible only to authorised persons with a legitimate need. Information will be accurate, relevant and retained under applicable employment, privacy and recordkeeping requirements. Child information used as evidence must be de-identified where practicable and handled under confidentiality policies.

POLICY REVIEW

Management will review this policy at least annually and earlier if legislation, service practices or identified risks change. Staff feedback and continuous improvement findings will inform updates.

STATUTORY LEGISLATION & CONSIDERATIONS

- Education and Care Services National Law and National Regulations as applied in NSW, including the paramount consideration of children's safety, rights and best interests.
- National Quality Standard: Quality Area 4 (staffing arrangements and professionalism), Quality Area 7 (governance, leadership and development of professionals) and other relevant areas.
- Fair Work Act 2009 (Cth), applicable modern awards and employment instruments, and relevant NSW and Commonwealth anti-discrimination and privacy laws.
- My Time, Our Place V2.0 and Belonging, Being & Becoming: Early Years Learning Framework V2.0, as applicable to each service.

SOURCES

- ACECQA – Guide to the National Quality Framework and Quality Areas 4 and 7.
- Fair Work Ombudsman – Managing performance and employee entitlements.
- Early Childhood Australia – Code of Ethics.

4.17 Store Room & Team Lounge Guidelines

INTRODUCTION

Safe, clean and organised storage areas and staff facilities support effective education and care, staff wellbeing and injury prevention. These guidelines apply across Cubby OOSH services, including before and after school care, vacation care and long day care, with practices adapted to the age and needs of children and each service environment.

PURPOSE

To establish consistent expectations for safe storage, hygiene, access, manual handling and shared responsibility for store rooms, resource cupboards and team lounges or staff break areas.

SCOPE

Applies to educators, management, support staff, students, volunteers and contractors where relevant. The Approved Provider and Nominated Supervisor must ensure safe systems, suitable equipment and reasonable facilities are available.

CHILD SAFETY AND ACCESS

Children's safety, rights and best interests are paramount when decisions about storage and access affect them. Store rooms, cleaning cupboards and staff-only lounges must not become unsupervised play areas or substitute spaces for children's care. Access is controlled according to the risks at each service.

- Keep chemicals, medications, sharp tools, choking hazards and other dangerous products locked or otherwise inaccessible to children in accordance with the relevant risk assessment and storage policy.
- Do not allow children to enter restricted storage or staff-only areas unsupervised, collect hazardous items, climb shelves or use equipment not approved for their age and abilities.
- Maintain clear emergency exits, corridors, access to first aid equipment and fire safety equipment; never block doors, walkways or emergency equipment with resources.
- Store resources used by younger children with particular attention to choking, entrapment and access hazards; adapt controls to the age, abilities and needs of children in care.

RESOURCE CUPBOARDS AND STORE ROOMS

- Return equipment to labelled, designated locations after use; keep storage areas tidy and ready for the next session.
- Place heavy or frequently used items between approximately knee and shoulder height where practicable, with lighter items above; do not overload shelves or stack unstable containers.
- Use an appropriate, inspected step platform or ladder where safe and authorised; never stand on chairs, tables or unstable furniture.
- Use team lifting, trolleys or other aids for bulky or awkward loads and follow the Educators Lifting & Bending Policy.
- Inspect shelving, hooks, containers and equipment for damage; report faults, spills, falling-object hazards and unsafe storage promptly.

- Store electrical equipment safely with cords secured and away from water; report damaged equipment and remove it from use pending assessment.
- Keep food, personal belongings and children's resources separate from chemicals and hazardous materials; retain current Safety Data Sheets where required.
- Follow service-specific cleaning, infection prevention and resource rotation routines, including safe storage of sensory and craft materials.

TEAM LOUNGE AND STAFF BREAK AREAS

- Use the lounge as a clean, respectful break and staff amenity space; it must not be used in a way that compromises required staffing ratios or supervision.
- Store bags, medications, personal devices and valuables in designated secure locations; ensure children cannot access personal medications, hot drinks or hazardous items.
- Wash, dry and put away used dishes; wipe benches and tables after use and clean spills promptly.
- Store food in sealed, labelled containers and follow hygienic refrigerator practices; remove spoiled or unclaimed food in accordance with the service cleaning schedule.
- Clean and maintain shared appliances and furniture according to manufacturer instructions; report faults and remove unsafe appliances from use.
- Keep walkways, exits and electrical outlets clear and dispose of waste in designated bins.
- Respect colleagues' privacy, break times and shared facilities; report maintenance or hygiene concerns without delay.

CLEANING, INSPECTIONS AND MAINTENANCE

- The service will allocate and communicate reasonable cleaning and checking responsibilities through its daily or weekly roster.
- Daily opening/closing and safety checks will identify obvious hazards, including unsafe stacks, unsecured chemicals, spills and blocked exits.
- The Nominated Supervisor or delegate will review identified issues and arrange timely corrective action, escalating serious risks to management.
- Storage layout and procedures will be reviewed after incidents, near misses, changes in resources or the environment, and when children's needs change.

RESPONSIBILITIES

Management and Nominated Supervisors will provide appropriate storage, clear expectations, induction, risk assessments and maintenance support. Educators and other workers will follow safe procedures, maintain shared spaces, report hazards and avoid unsafe lifting or storage practices. Contractors and visitors must follow relevant access and safety directions.

INCIDENTS AND ESCALATION

Any injury, near miss, chemical exposure, falling object, equipment fault or other safety concern must be addressed immediately, with first aid and emergency action where required. Record and escalate the matter under Cubby's incident and Work Health & Safety procedures. Relevant regulatory notifications must be made where statutory thresholds are met.

STATUTORY LEGISLATION & CONSIDERATIONS

- Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2017 (NSW), including duties to manage hazardous manual tasks and workplace risks.
- Education and Care Services National Law and National Regulations as applied in NSW, including child safety, premises, equipment, hygiene and supervision requirements.
- National Quality Standard: Quality Areas 2, 3 and 4, as applicable.
- SafeWork NSW and Safe Work Australia guidance on hazardous manual tasks, risk management and workplace facilities.

SOURCES

ACECQA – Guide to the National Quality Framework; SafeWork NSW – Work health and safety guidance; Safe Work Australia – Hazardous manual tasks and workplace facilities codes of practice.

4.18 Team Member Complaints & Grievance Procedures

INTRODUCTION

Cubby OOSH values feedback, open communication and fair resolution of workplace concerns. Team members may raise complaints or grievances without fear of victimisation. Concerns will be assessed impartially, addressed promptly and handled with appropriate confidentiality across Cubby education and care services.

PURPOSE

To provide a clear, accessible and fair process for raising, assessing, resolving, documenting and reviewing team member complaints, including workplace conflict, bullying, harassment, discrimination, employment concerns and health and safety matters. The process must never delay action needed to protect a child or meet a legal reporting duty.

SCOPE

Applies to the Approved Provider, management, Nominated Supervisors, Responsible Persons, educators, employees, volunteers, students and contractors where relevant, across before school care, after school care, vacation care and long day care. Different industrial instruments, staffing and operational requirements may apply to individual roles or services; these are addressed under the relevant law, award, agreement or service procedure.

PRINCIPLES

- Respect and procedural fairness: all parties have an opportunity to be heard and to respond to relevant allegations before findings are made, subject to necessary immediate protective measures.
- Accessibility: concerns may be raised verbally or in writing; staff may seek a support person, union representative, interpreter or reasonable adjustment.
- Impartiality: a person with an actual or perceived conflict of interest must not manage the matter; an independent manager or external investigator may be appointed.
- Confidentiality: information is shared only with those who need it for a fair process, support, safety or lawful reporting. Absolute confidentiality cannot be promised.
- No victimisation: retaliation against anyone who raises a genuine concern, participates in a process or makes a lawful external report is prohibited.
- Timeliness: acknowledge complaints promptly, provide reasonable progress updates and communicate outcomes as far as privacy and fairness permit.

CHILD SAFETY AND PARAMOUNTCY

Where a complaint concerns a child, child protection, unsafe supervision, inappropriate educator conduct or other child safety matter, the safety, rights and best interests of children are the paramount consideration. Take immediate protective action, preserve relevant evidence and follow Cubby child protection, incident, child safe environment and statutory notification procedures. Do not require informal mediation or an internal grievance process before taking protective action or reporting to authorities.

A staff complaint about possible harm to children may also trigger reporting to the NSW Early Learning Commission, the NSW Office of the Children's Guardian, NSW child protection authorities or Police, depending on the facts and legal thresholds. Management must assess the applicable notification category and timeframe promptly; not every workplace grievance is a notifiable complaint. Staff retain any individual mandatory reporting obligations.

DEFINITIONS

- Complaint: an expression of dissatisfaction or concern about workplace conduct, decisions, practices or conditions, whether informal or formal.
- Grievance: a workplace concern requiring structured management or review; seriousness is determined by the facts, not whether the concern was submitted in writing.
- Workplace conflict: disagreement between people; it does not necessarily involve misconduct.
- Bullying: repeated unreasonable behaviour directed towards a worker or group that creates a risk to health and safety. Reasonable management action carried out reasonably is not bullying.
- Reportable or notifiable matter: an allegation, incident or concern that meets the criteria of an applicable external reporting scheme.

HOW TEAM MEMBERS CAN RAISE CONCERNS

- Where safe and appropriate, staff may discuss a minor interpersonal issue directly with the other person, respectfully and away from children. Direct discussion is optional, not a prerequisite.
- A concern may be raised with the immediate supervisor, Nominated Supervisor, Area Manager, senior management or Approved Provider, verbally, by email or in writing.
- If the concern involves the supervisor or a manager, or the staff member is uncomfortable approaching them, report to another senior manager or the Approved Provider. If the Approved Provider is implicated, seek an independent pathway and/or the relevant external authority.
- Provide the concern, relevant dates, people involved, available evidence, immediate safety risks and the resolution sought, where known. Lack of documents does not prevent a complaint being received.
- Urgent child safety, violence, serious harassment, discrimination, suspected criminal conduct or serious WHS risk must be escalated immediately, not handled only through informal discussion.

COMPLAINT HANDLING PROCEDURE

1. Receive and acknowledge: Management will record the concern, acknowledge it as soon as reasonably practicable (normally within two working days), check for immediate child safety, WHS or wellbeing risks and identify the appropriate decision-maker.

2. Triage and protect: Decide whether informal resolution, facilitated discussion, formal investigation, external referral or urgent protective action is appropriate. Implement proportionate interim controls without prejudging the outcome. Separate child protection and statutory reporting from workplace dispute resolution.

3. Plan a fair process: Identify allegations and relevant evidence, conflicts of interest, support needs, confidentiality arrangements and anticipated timeframes. Notify affected persons of allegations sufficiently to enable a meaningful response, unless doing so must be deferred for lawful safety or investigative reasons.

4. Gather information: Speak privately with relevant people, review records and invite responses. Staff may bring a support person or representative, including a union representative. Seek consent before recording meetings and follow applicable law.

5. Determine findings and action: Make evidence-based findings on the balance of probabilities where appropriate, with regard to the seriousness of allegations. Possible outcomes include no further action, facilitated resolution, clarification of expectations, training, changes to work practices, support, risk controls, performance management or disciplinary action consistent with applicable employment law.

6. Communicate and review: Explain the outcome and relevant next steps to the complainant and respondent to the extent appropriate and lawful, while protecting others' confidential information. Aim to resolve straightforward matters within 10 working days where practicable; complex matters may take longer, with progress updates and documented reasons for delay.

7. Follow up: Check agreed actions, prevent retaliation, assess workplace risks and identify recurring themes for quality improvement.

MEDIATION AND INFORMAL RESOLUTION

Mediation or facilitated discussion may be offered where parties agree and the matter is suitable. It must not be used to pressure a person to withdraw a complaint or as a substitute for investigating serious bullying, harassment, discrimination, child safety concerns, violence or alleged criminal conduct. Participation in mediation is voluntary unless a lawful employment direction applies to an appropriate process.

EXTERNAL REPORTING AND WORKPLACE RIGHTS

Nothing in this policy prevents staff from contacting Fair Work Ombudsman, Fair Work Commission, SafeWork NSW, the Australian Human Rights Commission or Anti-Discrimination NSW, a union, Police, NSW child protection authorities, the NSW Office of the Children's Guardian or the NSW Early Learning Commission as appropriate. Staff do not need to exhaust internal procedures before exercising a legal right or meeting a reporting obligation. Applicable time limits for external applications may be short.

CONFIDENTIALITY, RECORDS AND PRIVACY

- Keep a secure record of the complaint, risk assessment, relevant evidence, steps taken, findings, actions and review.
- Restrict access to authorised people and retain records under applicable legal requirements and Cubby records policies.
- Do not promise secrecy where disclosure is necessary for procedural fairness, child protection, WHS, investigation or law.
- Discourage unnecessary gossip and protect staff and children from retaliation, without preventing lawful support-seeking or reporting.

RESPONSIBILITIES

- Approved Provider and management: ensure a safe and impartial complaints pathway, resources, timely risk controls, statutory notifications where required and continuous improvement.
- Nominated Supervisors and team leaders: listen, document and escalate concerns; preserve child safety and supervision; do not investigate matters in which they have a conflict.
- All team members: communicate respectfully, raise concerns in good faith, cooperate with lawful processes, maintain appropriate confidentiality and avoid victimisation.

REVIEW OR APPEAL

A person dissatisfied with the handling or outcome may request a review by a manager not previously responsible for the decision, where reasonably available. The review will consider fairness, new evidence and whether the outcome was reasonable. This does not limit external legal rights or statutory reporting.

STATUTORY LEGISLATION & CONSIDERATIONS

Education and Care Services National Law and National Regulations (NSW), including child safety paramountcy and relevant complaints/notification duties; National Quality Standard Quality Areas 2, 4 and 7; Fair Work Act 2009 (Cth); Work Health and Safety Act 2011 (NSW) and WHS Regulation 2017; Anti-Discrimination Act 1977 (NSW); applicable federal anti-discrimination legislation; Children's Guardian Act 2019 (NSW); child protection and privacy requirements; applicable modern awards and enterprise agreements.

SOURCES

ACECQA – Guide to the National Quality Framework and complaints guidance; NSW Early Learning Commission – notifications and child safety guidance; Fair Work Ombudsman – workplace rights and resolving workplace issues; Fair Work Commission – bullying and dispute pathways; SafeWork NSW – psychosocial hazards and workplace bullying; NSW Office of the Children's Guardian – reportable conduct scheme; Early Childhood Australia – Code of Ethics.

4.19 Participation of Volunteers & Students Policy

INTRODUCTION

Cubby OOSH welcomes appropriate volunteers, school work experience students and vocational or tertiary placement students. Placements support learning, community partnerships and quality practice while ensuring children are safe, respected and appropriately supervised.

PURPOSE AND SCOPE

This policy establishes consistent screening, induction, supervision, conduct, documentation and placement arrangements across Cubby education and care services, with particular consideration for before school care, after school care and vacation care. The same child-safe expectations apply across our services, with tasks and supervision adapted to the age and needs of children and the relevant service requirements.

PARAMOUNT CONSIDERATION AND CHILD SAFETY

The safety, rights and best interests of children are the paramount consideration in accepting, allocating, supervising or ending placements. Volunteers and students must not be used to fill unsafe staffing gaps or undertake tasks beyond their competence, training or authorised supervision. Any child protection or immediate safety concern must be acted on promptly, including required external reporting.

SCREENING AND APPROVAL BEFORE COMMENCEMENT

- Management must approve each placement and identify its purpose, dates, hours, institution/contact person, insurance arrangements and nominated educator mentor.
- Confirm identity and the person's eligibility and suitability, including NSW Working with Children Check (WWCC) requirements and verification where legally required. Assess any applicable exemptions carefully; do not assume that being a student or volunteer creates an exemption.
- Undertake and document reasonable child-safe screening, including checks for relevant regulatory prohibition, suspension or other restrictions and declarations where appropriate.
- Obtain placement agreements, required consents and emergency contact details. Confirm appropriate insurance and WHS arrangements with the educational institution or volunteer organisation.
- Do not allow a placement to begin until required screening and induction are completed. Recheck suitability when circumstances change.

INDUCTION AND ORIENTATION

- Provide a site tour, introductions, designated mentor, daily routines, restricted areas, emergency exits, evacuation/lockdown procedures and first aid arrangements.
- Explain child protection, mandatory reporting, professional boundaries, behaviour guidance, inclusion, supervision, safe arrival/departure, medical conditions, food safety, privacy and complaints procedures.
- Explain service digital technology rules: personal image-capable devices are restricted while working directly with children, subject to lawful exceptions; children's images may only be captured, stored or transmitted on approved service-supplied devices.
- Ensure students and volunteers sign the required confidentiality and conduct acknowledgements and understand how to report concerns without retaliation.

- Explain the approved scope of tasks, who to contact for assistance, attendance recording, breaks and expected professional conduct.

SUPERVISION AND RATIOS

A nominated educator mentor will supervise and guide the placement. As Cubby's child-safe operational rule, students and volunteers are not to be left alone with children and must not be relied on to satisfy minimum educator-to-child ratios. Any legally permitted alternative staffing arrangement must be separately authorised, assessed and documented by management; a placement is not automatically a qualified educator position.

- Educators remain responsible for active supervision, attendance checks, transitions, first aid, child guidance and all regulated responsibilities.
- Students and volunteers must remain within the agreed area and tasks, know where their mentor is, and seek help before moving between groups or taking a child elsewhere.
- Personal care, toileting, nappy changing, changing clothes, rest routines and one-to-one support require appropriate privacy safeguards and direct educator oversight. Students and volunteers must never independently conduct intimate care.
- Educators must consider children's views, comfort, consent and dignity when involving placement participants in activities.
- Placement tasks may differ between school-age OOSH and services caring for younger children; apply the relevant supervision, qualification, safety and age-specific requirements.

RESPONSIBILITIES OF MANAGEMENT AND NOMINATED SUPERVISOR

- Approve placements only where adequate mentoring, staffing and child-safe supervision can be maintained.
- Allocate a mentor and ensure educators understand the participant's role, learning objectives and restrictions.
- Inform children and families in an appropriate manner that a student or volunteer is present, without unnecessarily sharing personal information.
- Provide necessary child-specific safety information on a need-to-know basis only, such as medical response or risk minimisation arrangements.
- Maintain placement and volunteer records, monitor conduct and take prompt action on concerns, incidents or breaches.
- Liaise with the education institution regarding assessments, performance and any proposed changes or termination.

RESPONSIBILITIES OF EDUCATORS AND MENTORS

- Model respectful, inclusive and professional practice and provide constructive feedback.
- Provide safe, meaningful learning opportunities and explain the reasons behind service practices.
- Maintain responsibility for supervision and assess whether a proposed task is suitable for the participant's training and competence.
- Escalate performance, boundary, child safety or wellbeing concerns promptly and document significant issues.

- Support reflective discussions and complete institutional assessments accurately, within the limits of direct observation.

RESPONSIBILITIES OF STUDENTS AND VOLUNTEERS

- Follow lawful directions, service policies, child-safe practices, the Code of Conduct and the agreed placement scope.
- Sign in and out accurately, attend agreed shifts, notify absences promptly and wear appropriate identification where required.
- Respect children's rights, choices, privacy, cultural identity and additional support needs; use positive and developmentally appropriate interactions.
- Never be alone with a child, remove a child from educator supervision, administer medication, release children, transport children or conduct intimate care without the applicable authorisation and direct educator oversight.
- Do not photograph or film children on personal devices, share child information, contact children privately or post placement content on personal social media.
- Report hazards, injuries, suspected abuse, inappropriate conduct, near misses or breaches immediately through appropriate internal and external pathways.
- Provide institution assessment information in advance and ask for support when unsure.

PLACEMENT ACTIVITIES, OBSERVATIONS AND CONFIDENTIALITY

Any child observations, photographs, portfolios, assignments or case studies must comply with family authorisations, child privacy, institutional requirements and Cubby's record and digital-device policies. Use de-identified information where possible. No identifiable child information may be removed, uploaded to personal accounts or submitted to an institution without appropriate approval and lawful basis. Information access is limited to what is necessary for the approved learning activity.

FEEDBACK, CONCERNS AND PLACEMENT REVIEW

The mentor will provide timely feedback and, where practicable, review progress with the participant and education institution. Concerns should be explained fairly, with a chance to respond and an appropriate improvement plan where safe. Immediate protective action may be taken before a full review if a child is at risk. Placement participation may be paused or ended for serious safeguarding concerns, failure to meet required screening, repeated breaches, impairment, unsafe conduct or inability to maintain safe supervision. Notify the institution as appropriate, document the decision and complete any statutory reporting obligations.

EMERGENCY ARRANGEMENTS AND STAFFING

Students and volunteers must follow emergency instructions and assist only within their training and allocated responsibilities. They do not replace rostered educators or relieve Cubby of ratio and adequate-supervision obligations. The previous reference to emergency placement of additional children under Regulation 123(6) is outside the scope of student and volunteer participation and must be managed through the separate enrolment, staffing and emergency procedures.

RECORDS AND REVIEW

Maintain appropriate records of identity and eligibility checks, WWCC verification where required, placement approval, institution/insurance details, induction, attendance, signed acknowledgements, mentor allocation, incidents and performance reviews. Protect personal information and retain records in accordance with applicable law and Cubby recordkeeping procedures. Review this policy at least annually and when legislation or service practice changes.

STATUTORY LEGISLATION & CONSIDERATIONS

Education and Care Services National Law (NSW), including the paramount consideration of children's safety, rights and best interests; Education and Care Services National Regulations, including Regulations 149 and 168 and applicable staffing, supervision, records and child safety requirements; National Quality Standard QA2, QA4, QA6 and QA7; Child Protection (Working with Children) Act 2012 (NSW); Children's Guardian Act 2019 (NSW); Work Health and Safety Act 2011 (NSW); relevant privacy and employment legislation. My Time, Our Place V2.0 guides OOSH practice and EYLF V2.0 applies where relevant to younger children.

SOURCES

ACECQA – Guide to the National Quality Framework and strengthened child safety requirements; NSW Office of the Children's Guardian – Working with Children Check guidance; NSW Early Learning Commission – child safety reforms; Fair Work Ombudsman – unpaid work and vocational placements; Early Childhood Australia – Code of Ethics.

4.20 Team Member Immunisation Policy

INTRODUCTION

Education and care settings can expose team members and children to vaccine-preventable infections. Cubby OOSH promotes evidence-based immunisation, infection prevention and safe work practices across its education and care services, including before and after school care, vacation care and long day care.

PURPOSE

To reduce the risk of infectious disease transmission, provide reliable vaccination guidance, manage workplace exposure risks fairly and protect the safety, rights and best interests of children and the health of educators and other team members.

SCOPE

This policy applies to employees, educators, management, students and volunteers where relevant. It applies across Cubby services; the risk assessment must reflect the age of children cared for, duties undertaken and current NSW public health advice. Younger children, infants and some medically vulnerable children may require additional controls.

IMMUNISATION RECOMMENDATIONS

Team members are encouraged to discuss their vaccination history, individual risks and eligibility with their GP or immunisation provider and follow the current Australian Immunisation Handbook and National Immunisation Program recommendations. Recommendations vary according to age, pregnancy, immunity, health conditions, occupation and exposure risk; there is no universal requirement to repeat all vaccinations every five years.

- Influenza: annual vaccination is recommended for people working in education and care, particularly where caring for young children.
- Measles, mumps and rubella (MMR), varicella (chickenpox), pertussis (whooping cough), diphtheria and tetanus: assess immunity and recommended catch-up or booster doses in line with current clinical guidance.
- Hepatitis A and B: may be recommended for particular occupational exposures or individual circumstances; not automatically required for every team member.
- COVID-19: follow current Australian Government recommendations relevant to age and risk; do not assume a universal annual or compulsory dose.
- Other vaccines may be recommended on individual clinical advice or during public health responses.

IMMUNISATION STATUS, CONSENT AND PRIVACY

Cubby may request vaccination or immunity information only where reasonably necessary for a lawful workplace health and safety purpose, applicable public health direction or risk assessment. Management will explain the purpose, protect sensitive health information, limit access and retain records in approved secure systems. A vaccination declaration or evidence requirement must have a lawful basis and be proportionate; vaccination is not automatically a condition of employment under this policy.

A team member may raise medical contraindications, disability, pregnancy or other relevant circumstances confidentially with management. Cubby will consider reasonable adjustments, alternative duties and other proportionate risk controls consistent with applicable law and public health directions. Team members are not expected to share detailed medical histories with colleagues or families.

INFECTION PREVENTION AND EXPOSURE MANAGEMENT

- Follow hand hygiene, respiratory etiquette, cleaning, ventilation, safe food handling, standard precautions and relevant personal protective equipment requirements.
- Do not attend work when infectious or too unwell to perform duties safely; follow current disease-specific NSW Health exclusion and return-to-work advice.
- Immediately advise the Nominated Supervisor or management of a suspected exposure, diagnosis or outbreak that may create a workplace risk, providing only necessary information.
- Management will assess the disease, exposure, vulnerability of children and staff, and advice from NSW Health; implement isolation/exclusion, cleaning, communication, staffing or other controls as appropriate.
- Notify families and team members of relevant infectious disease occurrences in accordance with Regulation 88 and current public health guidance, without disclosing a person's identity unnecessarily.
- Seek NSW Health or public health unit advice when required, including for measles, pertussis and other notifiable infections; manage statutory notifications under the applicable incident and illness policies.

CHILD SAFETY AND PARAMOUNTCY

When responding to an infectious disease risk, the safety, rights and best interests of children are the paramount consideration. Decisions must account for medically vulnerable children, continuity of safe care, dignity, inclusion and reasonable adjustments. No team member is to be stigmatised or subjected to unfair treatment based solely on vaccination status.

ROLES AND RESPONSIBILITIES

Approved Provider / management: maintain current evidence-based guidance, conduct service-specific risk assessments, provide reasonable infection control resources, protect medical privacy, seek expert advice where needed and meet applicable notification and employment obligations.

Nominated Supervisor / Responsible Person: implement controls, respond to exposures, communicate necessary information, maintain supervision and safe staffing, and escalate public health or child safety concerns promptly.

Team members, volunteers and students: follow infection prevention measures, stay home when exclusion applies, report relevant risks promptly, seek personal vaccination advice and respect the confidentiality of others.

STATUTORY LEGISLATION & CONSIDERATIONS

Education and Care Services National Law (NSW) and National Regulations, including Regulations 77, 85–88 and 168 as applicable; National Quality Standard QA2 and QA4; Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2017 (NSW); Public Health Act 2010 (NSW); Privacy Act

1988 (Cth) where applicable; relevant anti-discrimination and employment laws; current NSW Health directions and advice.

SOURCES

Australian Immunisation Handbook (Australian Government Department of Health); NSW Health infectious diseases and exclusion guidance; Australian Government National Immunisation Program; ACECQA Guide to the National Quality Framework; Staying Healthy: Preventing infectious diseases in early childhood education and care services (current edition).

4.21 Disciplinary Action Policy

INTRODUCTION

Cubby OOSH is committed to a safe, respectful and accountable workplace. Concerns about team member performance or conduct will be managed promptly, consistently and fairly, while protecting children and meeting applicable employment and regulatory obligations.

PURPOSE

To establish a transparent process for responding to unsatisfactory performance, misconduct and serious misconduct; providing opportunities for improvement where appropriate; and taking timely protective action when required.

SCOPE

This policy applies to employees across Cubby education and care services, including before school care, after school care, vacation care and long day care. Relevant expectations also inform management of volunteers, students and contractors, subject to their engagement arrangements. It operates alongside the Code of Conduct, grievance, child protection, WHS and other applicable policies.

CHILD SAFETY AND PARAMOUNTCY

Children's safety, rights and best interests are the paramount consideration in decisions affecting their education and care. Concerns involving child abuse, neglect, grooming, inadequate supervision, inappropriate discipline, unauthorised images or other risks must be acted upon immediately. Protective action and statutory reporting must not wait for completion of the ordinary disciplinary steps. Financial, reputational or staffing concerns must not override child safety.

GUIDING PRINCIPLES

- Apply procedural fairness: clearly identify concerns, provide relevant particulars and a genuine opportunity to respond before a final adverse decision, except where immediate protective action is required.
- Assess seriousness, evidence, context, prior guidance, consistency, potential risk and reasonable adjustments; avoid predetermined outcomes.
- Distinguish capability/performance issues from misconduct, serious misconduct, complaints and protected disclosures.
- Allow a support person, including a union representative, at formal meetings; do not unreasonably refuse a reasonable request.
- Maintain confidentiality on a need-to-know basis, protect against victimisation and preserve accurate records.
- Employees may raise lawful concerns with Fair Work, SafeWork NSW, Police, the NSW Early Learning Commission, the Office of the Children's Guardian or other relevant authorities without exhausting internal processes.

EARLY SUPPORT AND INFORMAL FEEDBACK

Where appropriate and safe, the supervisor will discuss the concern privately, clarify required standards, listen to the employee's explanation, identify training or resources, agree on measurable improvement actions and a reasonable review date, and document the discussion. Informal coaching is not mandatory before formal action where the concern warrants a stronger response.

STEP 1 – FORMAL PERFORMANCE OR CONDUCT MEETING

- Advise the employee of the concerns and meeting purpose with reasonable time to prepare; provide available relevant information.
- Offer a support person and opportunity to respond, including any relevant mitigating circumstances or reasonable adjustments.
- Decide whether coaching, a documented verbal warning, training or a performance improvement plan is appropriate.
- Record expectations, support, measurable actions, review date and potential consequences of continued concerns; provide the employee a copy.

STEP 2 – WRITTEN WARNING OR IMPROVEMENT PLAN

If concerns continue, or the initial issue warrants it, management may issue a written warning following a fair assessment. The notice will describe the substantiated concern, required changes, assistance offered, review timeframe and possible consequences if improvement does not occur. The employee may provide a written response, which will be kept with the record. There is no universal legal requirement for a fixed number of warnings.

STEP 3 – FINAL WARNING OR FURTHER ACTION

Where proportionate, a final written warning may be issued after a further meeting and consideration of the employee's response. Management will confirm expectations, support and a reasonable review period. A final warning is not automatic and does not guarantee termination if later concerns arise; each decision must be assessed on its merits.

STEP 4 – TERMINATION OR OTHER OUTCOME

Where employment termination is being considered, authorised management will review evidence, relevant employment instruments, procedural fairness, notice and final pay obligations, and any applicable consultation or redeployment considerations. The employee must be informed of the reason and have an opportunity to respond before a final decision, where practicable and lawful. Outcomes may include no action, further support, reassignment, warning, or termination with required notice or payment in lieu, unless lawful summary dismissal applies.

SERIOUS MISCONDUCT AND IMMEDIATE PROTECTIVE ACTION

Examples requiring urgent assessment include violence or threats, sexual misconduct, child abuse or grooming, serious supervision failures, serious dishonesty, significant breaches of confidentiality or child-image rules, serious WHS breaches, or working while significantly impaired. An allegation is not proof of misconduct.

- Immediately safeguard children, maintain ratios and adequate supervision, preserve evidence and escalate to the Approved Provider or authorised management.

- Consider temporary removal from child-facing duties, alternative duties or suspension while inquiries proceed; any suspension and pay arrangements must be lawful and documented.
- Make required reports to Police, child protection authorities, the Office of the Children's Guardian and/or NSW Early Learning Commission as applicable, within statutory timeframes. Internal investigations must not obstruct external investigations.
- Use an impartial investigator where appropriate, manage conflicts of interest, interview relevant people and give the employee a fair opportunity to respond when safe and appropriate.
- Do not promise a fixed 72-hour investigation or automatic dismissal; act as promptly as circumstances and statutory directions permit.

INVESTIGATION AND RECORD KEEPING

Maintain a secure, factual record of allegations, immediate safety controls, interviews, evidence, decisions, employee responses, support offered, notifications and outcomes. Access is restricted to authorised personnel. Records will be retained under applicable education and care, employment and privacy requirements. An employee's refusal to sign a record does not invalidate it; note the refusal and offer a copy.

EMPLOYEE SUPPORT, REVIEW AND NON-RETALIATION

Employees may request clarification or review through management or the Team Member Complaints & Grievance Procedures. Bullying, retaliation, coercion or adverse action for exercising workplace rights, making a protected disclosure or raising genuine child safety concerns is prohibited. Consider wellbeing, cultural safety, disability-related adjustments and access to relevant support.

ROLES AND RESPONSIBILITIES

- Approved Provider/management: authorise serious disciplinary decisions, maintain fair procedures, ensure child safety action and regulatory reporting, and protect records.
- Nominated Supervisor/Responsible Person: manage immediate supervision and safety, report concerns promptly and cooperate with authorised processes.
- Supervisors: communicate expectations, document evidence objectively, provide coaching and refer serious matters without delay.
- Team members: follow policies and lawful directions, participate honestly in processes, maintain confidentiality and report safety concerns.

STATUTORY LEGISLATION & CONSIDERATIONS

Education and Care Services National Law and National Regulations as applied in NSW; National Quality Standard (particularly Quality Areas 2, 4 and 7); Fair Work Act 2009 (Cth), National Employment Standards and applicable awards/agreements; Work Health and Safety Act 2011 (NSW); Children's Guardian Act 2019 (NSW); Child Protection (Working with Children) Act 2012 (NSW); relevant privacy and anti-discrimination legislation.

SOURCES

Fair Work Ombudsman – managing performance and ending employment: https://www.fairwork.gov.au; Fair Work Commission – unfair dismissal and serious misconduct: https://www.fwc.gov.au; ACECQA – National Quality

Framework: https://www.acecqa.gov.au; NSW Office of the Children's Guardian – reportable conduct: https://ocg.nsw.gov.au; SafeWork NSW: https://www.safework.nsw.gov.au.

4.22 Publicity & Media Policy

INTRODUCTION

Cubby OOSH is committed to accurate, respectful and responsible public communication across its education and care services. The safety, rights, dignity and privacy of children, families and team members guide all media and publicity decisions.

PURPOSE

This policy establishes responsibilities for media enquiries, public statements, critical incident communications, publicity, photography and external requests for information. It protects confidential information while ensuring lawful reporting, transparent family communication and appropriate cooperation with authorities.

SCOPE

This policy applies to all Cubby OOSH services, including before school care, after school care, vacation care and long day care, and to management, educators, other team members, students, volunteers and contractors. It covers traditional media, websites, social media, newsletters, promotional materials and public enquiries.

PARAMOUNT CONSIDERATION AND CHILD SAFETY

The safety, rights and best interests of children are the paramount consideration in decisions about public communications. Protecting the organisation's reputation, convenience or commercial interests must never prevent action needed to protect a child, meet a reporting duty or share information lawfully with authorities.

- Do not identify a child, disclose sensitive circumstances or publish a child's image without the required authority, safeguards and consideration of potential harm.
- Respect children's views, dignity, cultural identity and privacy when creating or sharing approved publicity.
- Prioritise the child's immediate safety and required notifications before considering public relations responses.

MEDIA ENQUIRIES AND AUTHORISED SPOKESPERSONS

- Refer enquiries from journalists, television, radio, online news outlets and content creators to the Approved Provider or an authorised management spokesperson.
- Unless authorised to speak, respond politely: 'I'm not authorised to comment on behalf of Cubby OOSH. I can refer your enquiry to management.' Do not speculate or disclose confidential details.
- Only authorised spokespersons may issue official media statements, confirm incidents publicly or provide interviews on behalf of Cubby OOSH.
- Refer requests for comment involving legal proceedings, allegations or critical incidents to management for a coordinated, lawful response.
- Employees retain the right to make lawful personal statements, protected disclosures, complaints or reports to authorities; this policy does not prohibit those rights.

CRITICAL INCIDENTS AND STATUTORY REPORTING

In an emergency or critical incident, educators must first secure children's safety, provide first aid, contact emergency services as necessary, notify the Nominated Supervisor/Responsible Person and follow the relevant incident, emergency, child protection and notification procedures.

- Make mandatory child protection reports and notifications to the NSW Early Learning Commission, Office of the Children's Guardian, Police or other authorities when required. Management approval must not delay or prevent a legal reporting duty.
- Cooperate with authorised regulatory officers and lawful information requests; do not withhold records or direct witnesses to remain silent.
- Inform affected families promptly and sensitively as required by law and service procedures, without disclosing another child's or person's confidential information.
- Record factual information, preserve relevant evidence and refer external media enquiries to the authorised spokesperson.
- Do not post incident details, photographs or speculation on personal accounts or group chats.

ROUTINE FAMILY AND COMMUNITY COMMUNICATION

Educators may communicate routine, authorised service information to families through approved channels within their role. Questions about a child's care, attendance or wellbeing must be handled through normal service procedures; they must not be automatically referred to a lawyer or media spokesperson. Complex, disputed or sensitive matters should be escalated to the Nominated Supervisor or management.

PUBLICITY, PHOTOGRAPHY AND PROMOTIONAL CONTENT

- Obtain and check current applicable family authorisations before photographing or publishing a child in marketing, newsletters, websites or social media; respect refusals and any limitations.
- Only approved service-supplied devices may be used to capture, store or transmit children's images in accordance with current centre-based education and care requirements and service digital safety policies.
- Use approved Cubby accounts and publishing processes; check accuracy, permissions, background information and identifying details before release.
- Do not publish confidential child, family, staff, school or service information, or images that compromise a child's dignity, safety or privacy.
- Where practical and appropriate, seek children's assent and respect their wish not to be photographed or featured, even where parental authorisation exists.
- Remove or correct content promptly where consent has been withdrawn for future use, an error is identified or a safety/privacy concern is raised, subject to lawful recordkeeping.

SOCIAL MEDIA, PERSONAL COMMENTS AND CONFIDENTIALITY

- Do not represent personal opinions as official Cubby OOSH positions or use Cubby branding without authorisation.

- Do not disclose private or identifying information about children, families, colleagues or incidents through personal social media, messaging or online forums.
- Raise concerns through appropriate channels without discouraging lawful complaints, workplace rights, whistleblowing or statutory reports.
- Refer suspected unauthorised image sharing, privacy breaches, media misinformation or reputational risks to management for prompt assessment and action.

RESPONSIBILITIES

Approved Provider/Management: nominate authorised spokespersons; approve public materials; oversee legal notifications, privacy safeguards, complaints and incident communications; support staff to comply with reporting duties.

Nominated Supervisor/Responsible Person: manage immediate safety and service communications; support staff; check authorisations; promptly escalate serious matters and keep accurate records.

Educators, students and volunteers: communicate respectfully; maintain confidentiality; follow device and publicity rules; report concerns promptly; cooperate with lawful investigations.

BREACHES AND REVIEW

Potential breaches will be assessed promptly, fairly and proportionately in accordance with the Code of Conduct, privacy, child protection and disciplinary policies. Serious child safety or privacy concerns may require immediate protective action and external notification. This policy will be reviewed at least annually and following material legislative or operational changes.

STATUTORY LEGISLATION & CONSIDERATIONS

Education and Care Services National Law as applied in NSW; Education and Care Services National Regulations (including requirements relating to child safety, confidentiality, policies and digital devices); National Quality Standard, particularly QA2, QA4, QA6 and QA7; NSW child protection and reportable conduct laws; Privacy Act 1988 (Cth) and Australian Privacy Principles where applicable; relevant NSW privacy, surveillance and employment laws.

SOURCES

ACECQA – Guide to the National Quality Framework; ACECQA – strengthened child safety and digital device requirements; NSW Early Learning Commission – child safety reforms and reporting guidance; Office of the Children's Guardian – reportable conduct; Office of the Australian Information Commissioner – Australian Privacy Principles; Early Childhood Australia – Code of Ethics.

4.23 Pregnancy Policy

INTRODUCTION

Cubby OOSH supports pregnant team members to work safely, maintain dignity and privacy, access their workplace entitlements and plan for parental leave and return to work. Individual circumstances will be considered through consultation, risk assessment and reasonable workplace adjustments.

PURPOSE

To provide consistent, supportive and legally compliant processes for managing pregnancy-related work health and safety risks, suitable duties, parental leave and return-to-work arrangements across Cubby education and care services.

SCOPE

This policy applies across Cubby OOSH before school care, after school care, vacation care and long day care services. The same employment and work health and safety principles apply, with risks and duties assessed according to the ages and needs of children, tasks and service environments.

SUPPORT, PRIVACY AND NON-DISCRIMINATION

- Treat pregnancy, potential pregnancy, breastfeeding and family responsibilities respectfully and without unlawful discrimination, harassment or adverse treatment.
- A team member may choose when to disclose a pregnancy, subject to providing information reasonably needed to address workplace safety or access entitlements. Seek only relevant information and protect its confidentiality.
- Consult privately with the team member about work requirements and adjustments. Do not assume pregnancy makes a team member incapable of performing their role.
- Consider reasonable adjustments and flexible work requests in accordance with applicable law, operational needs and safe staffing.

PREGNANCY-RELATED WORK HEALTH AND SAFETY

The Nominated Supervisor and management will consult with the team member and assess relevant hazards, reviewing controls as pregnancy progresses or circumstances change. Medical advice may be requested where reasonably necessary to understand functional restrictions, without seeking unnecessary clinical details.

- Assess manual handling, repetitive lifting, lifting children, floor-based tasks, prolonged standing, fatigue, heat, outdoor exposure, slips and falls, physical aggression and challenging behaviour. Do not impose an arbitrary universal 10 kg lifting rule; use individual risk assessment and clinical advice.
- Provide suitable equipment, assistance with heavy or awkward set-up, seating, hydration, access to toilets and rest breaks, and adjusted duties or rosters where reasonably practicable.
- Review infection prevention measures and occupational exposures, including cytomegalovirus (CMV), parvovirus B19, rubella, varicella and other communicable diseases. Reinforce hand hygiene, safe handling of bodily fluids and relevant public health guidance.

- Encourage team members to discuss vaccination status, exposure concerns and individual pregnancy risks with their treating clinician; refer to the Australian Immunisation Handbook and current NSW Health advice.
- Maintain required educator-to-child ratios, adequate supervision, emergency preparedness and child safety when changing duties, breaks or rosters.

PARAMOUNT CONSIDERATION FOR CHILDREN

When arranging adjusted duties, relief staffing, breaks or leave coverage, the safety, rights and best interests of children remain the paramount consideration. No pregnant team member should be pressured to perform unsafe tasks, and Cubby must arrange appropriate staffing and supervision rather than compromise children's safety or the team member's wellbeing.

SAFE JOBS AND PREGNANCY-RELATED LEAVE

Where a pregnant team member can work but their usual position presents a pregnancy-related risk, Cubby will consider appropriate safe-job arrangements in line with the Fair Work Act 2009. If no appropriate safe job is available, applicable no-safe-job leave entitlements will be assessed, including paid or unpaid leave depending on eligibility. Pregnancy-related illness or other incapacity may attract personal leave or special maternity leave where statutory conditions are met. Decisions will be confirmed in writing.

PARENTAL LEAVE AND NOTICE

Eligible employees may access unpaid parental leave under the National Employment Standards, generally after 12 months of continuous service, including eligible regular and systematic casual employees. The standard entitlement is up to 12 months, with a right to request a further period of up to 12 months subject to statutory rules. Partners may have separate entitlements, and leave may be taken flexibly in accordance with current legislation.

- Give written notice of intended unpaid parental leave generally at least 10 weeks before starting, where practicable, including expected dates; confirm dates at least four weeks before leave starts, or as soon as reasonably practicable where circumstances change.
- Provide reasonable evidence of expected birth or placement if requested under the Fair Work Act; evidence requirements must not be used to unfairly deny a lawful entitlement.
- Requests to extend leave, change dates, take flexible unpaid parental leave or work during leave will be managed under current National Employment Standards and documented with management.
- Government-funded Parental Leave Pay is administered under Services Australia rules and is separate from an employer's unpaid parental leave obligations. Check current eligibility, duration and payment arrangements rather than relying on outdated fixed entitlements.

RETURN TO WORK AND FLEXIBLE ARRANGEMENTS

- Discuss the expected return date, role, any breastfeeding or expressing needs, safe working arrangements and possible flexible work requests in advance.
- Respect the statutory return-to-work guarantee to the pre-parental-leave position, or the nearest available position in status and pay if that position no longer exists, subject to applicable law.

- Consider flexible work requests and respond in writing within the time required by the Fair Work Act; any refusal must meet applicable statutory requirements.
- Do not impose a blanket prohibition on working in the same room or service as a team member's child. Manage any actual conflict, supervision or professional boundary concern fairly and individually.
- Inform temporary replacement staff of the temporary nature of the engagement and the absent employee's return-to-work rights as required.

RESPONSIBILITIES AND RECORD KEEPING

Management will consult, assess and document work risks and adjustments, confirm leave arrangements, maintain safe staffing and protect sensitive information. Nominated Supervisors will implement agreed controls and report changes or concerns. Team members will take reasonable care, follow safe procedures and communicate relevant functional restrictions and leave intentions. Records will be stored securely with access limited to authorised personnel.

STATUTORY LEGISLATION & CONSIDERATIONS

Fair Work Act 2009 (Cth), National Employment Standards and applicable awards/agreements; Sex Discrimination Act 1984 (Cth); Anti-Discrimination Act 1977 (NSW); Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2017 (NSW); Education and Care Services National Law and National Regulations as applied in NSW; National Quality Standard QA2 and QA4; applicable privacy laws.

SOURCES

Fair Work Ombudsman – Pregnancy at work, Safe jobs and no safe job leave, Parental leave and Returning to work; SafeWork NSW – Managing work health and safety risks; Australian Immunisation Handbook – Vaccination for people at occupational risk; NHMRC – Staying Healthy: Preventing infectious diseases in early childhood education and care services; Services Australia – Parental Leave Pay.

4.24 Traineeship Policy

INTRODUCTION

Cubby OOSH supports employees to gain nationally recognised education and care qualifications through approved employment-based traineeships and apprenticeships. Training arrangements must support genuine learning, lawful employment conditions, appropriate supervision and quality care for children.

PURPOSE

To set consistent expectations for traineeship approval, training plans, paid training, mentoring, progress monitoring and completion across Cubby education and care services, including before and after school care, vacation care and long day care.

SCOPE

This policy applies to the Approved Provider, management, Nominated Supervisors, trainees, workplace mentors and registered training organisations (RTOs). Training activities and assessment must reflect the ages and needs of children at the service and the relevant approved learning framework, My Time, Our Place V2.0 or the Early Years Learning Framework V2.0.

CHILD SAFETY AND SUPERVISION

Children's safety, rights and best interests are the paramount consideration when allocating trainee duties, supervision and training time. Training requirements must not compromise required educator-to-child ratios, adequate supervision, child protection or safe transitions.

- A trainee may only be counted towards required ratios where permitted by the applicable National Regulations and NSW requirements, and only while genuinely working directly with children and appropriately supervised.
- A trainee's enrolment in a qualification does not automatically make them a qualified educator; management must verify whether they are working towards an approved qualification and satisfy any applicable conditions.
- Trainees must complete child protection, safe conduct, emergency, medical, hygiene, digital safety and service-specific induction before undertaking relevant duties.
- Training or study release must be covered by an appropriate staffing arrangement; trainees must not be left to supervise children beyond their competence or authority.

APPROVAL AND TRAINING CONTRACT

- Management will confirm the proposed qualification, eligibility, employment classification, training provider, funding arrangements and appropriate workplace supervision before commencement.
- The trainee, employer and RTO must enter the required NSW training contract and develop a training plan within the timeframes required by the relevant training authority and contract.
- The training plan must identify competencies, workplace learning, assessment, responsibilities, support, expected milestones and any required off-the-job training.

- Each party must receive or have access to current training documentation. Any change to the contract, provider, employment arrangements or training plan must be managed through the required formal process.

PAID TRAINING TIME AND WORKPLACE SUPPORT

Cubby will provide the paid training, release time and supervision required by the applicable award, registered training contract, training plan and law. The former blanket requirement of three hours per week, including a separate 1.5-hour long day care rule, is not applied as a universal statutory entitlement; the appropriate amount and method must be confirmed for each traineeship.

- Roster protected study or training time where required, with safe staffing coverage and realistic access to computers, resources and assessment opportunities.
- Provide a suitably experienced workplace mentor who can demonstrate practice, give feedback and liaise with the RTO.
- Support a mix of supervised practice, relevant policy review, reflective discussion, workplace assessment, RTO meetings and off-the-job learning as required.
- Keep accurate records of paid work, training and any applicable release time. Do not require unpaid mandatory training where payment is legally required.
- Apply the correct wage classification, progression, entitlements and allowances under the applicable award, enterprise agreement or employment instrument.

TRAINEE RESPONSIBILITIES

- Attend rostered work and required training, participate in assessments and maintain reasonable progress under the training plan.
- Follow all service policies, professional boundaries, child protection obligations, supervision directions and confidentiality requirements.
- Seek assistance when a task is outside current competence or could place a child or colleague at risk.
- Provide relevant progress updates and notify the mentor or management promptly of training difficulties, absences or proposed changes.
- Treat children, families, colleagues and RTO representatives respectfully and contribute to a safe, inclusive learning environment.

MENTOR AND MANAGEMENT RESPONSIBILITIES

- Provide an appropriate induction, workplace learning opportunities, supervision, feedback and reasonable access to required assessment activities.
- Check qualification and regulatory status before counting any trainee in educator-to-child ratios; monitor the actual level of supervision needed.
- Review progress regularly with the trainee and RTO and document agreed support, adjustments and action plans.
- Address workload, wellbeing, disability-related adjustments, literacy or language support and other barriers fairly and confidentially.

- Ensure training arrangements comply with workplace health and safety, child safe standards and relevant employment obligations.

PROGRESS CONCERNS, CHANGES AND COMPLETION

Where progress or conduct concerns arise, management will consult the trainee and RTO, identify the concern, offer appropriate support and agree on reasonable review steps. Changes, suspension, cancellation or transfer of a traineeship must follow the NSW training contract process and applicable employment law; ending a training contract does not automatically determine the lawful status of employment. Completion will be verified with the RTO and relevant authority, and any subsequent qualification or wage classification change reviewed.

RECORDS AND CONFIDENTIALITY

Training contracts, plans, progress reviews, qualifications, supervision records and relevant payroll documentation will be stored securely and accessible only to authorised persons. Records required for regulatory inspection will be available at the service or through an approved accessible system as applicable.

STATUTORY LEGISLATION & CONSIDERATIONS

Apprenticeship and Traineeship Act 2001 (NSW) and applicable NSW training contract requirements; Fair Work Act 2009 (Cth), National Employment Standards and applicable modern awards (including Children's Services Award 2010 or Educational Services (Teachers) Award 2020 where applicable); Education and Care Services National Law and National Regulations as applied in NSW; National Quality Standard QA2, QA4 and QA7; Work Health and Safety Act 2011 (NSW); relevant child protection and anti-discrimination law.

SOURCES

NSW Government – Training Services NSW apprenticeships and traineeships guidance; Fair Work Ombudsman – apprentices and trainees, training time and awards; ACECQA – qualification requirements and Guide to the National Quality Framework; relevant RTO training plan and registered training contract.

4.25 Time Off in Lieu (TOIL) Policy

INTRODUCTION

Cubby OOSH recognises that approved additional hours may sometimes be necessary to support safe, consistent education and care. Time off in lieu of overtime (TOIL) may be agreed where permitted by the applicable modern award, enterprise agreement or employment arrangement. TOIL is not an automatic substitute for overtime pay.

PURPOSE

To establish a fair, transparent process for approving, recording and taking TOIL, protecting employees' pay and work-life balance while ensuring children remain safely supervised.

SCOPE

This policy applies across Cubby OOSH before school care, after school care, vacation care and long day care services. Entitlements depend on each employee's applicable industrial instrument and employment classification; full-time, part-time and casual employees must not be categorically excluded where an applicable instrument permits TOIL.

DEFINITIONS

Overtime: hours that attract overtime under the relevant award, agreement or contract, rather than simply any time beyond a published roster. TOIL: paid time away from work agreed in place of payment for specified overtime hours, subject to the applicable industrial rules. Additional ordinary hours: extra hours that do not necessarily attract overtime; these must be assessed and paid or managed under the applicable instrument.

IMPLEMENTATION – APPROVAL AND AGREEMENT

- The Nominated Supervisor or manager must identify the operational reason for additional hours, obtain the necessary approval and arrange adequate supervision and staffing. Where an emergency prevents advance approval, the employee must report actual time worked promptly; legally payable hours must still be recorded and paid.
- Before TOIL is used, Cubby and the employee must make a separate written agreement for the relevant overtime, where required by the applicable award or agreement. The record must identify the overtime hours, when they were worked, the applicable TOIL entitlement and the parties' agreement.
- An employee may decline a TOIL arrangement and receive overtime payment in accordance with the applicable instrument. TOIL must never be imposed unilaterally.
- The amount of paid time off, any overtime loading, deadline to take TOIL and ability to request payment instead are governed by the applicable award or enterprise agreement. Do not assume one hour off for every overtime hour or a universal six-month expiry.
- The previous fixed rules of 15-minute eligibility, five hours per month, two hours for meetings and automatic forfeiture after six months do not override lawful pay entitlements. Staff meetings, training and required work must be counted and paid in accordance with applicable employment requirements.

RECORDING AND PAYROLL

- Employees record actual start and finish times, breaks, additional work and approved TOIL in the payroll/timekeeping system and TOIL Hours Record. The roster alone is not proof of hours worked.

- Management and payroll verify whether the hours are ordinary time, overtime or another applicable entitlement, and retain the written TOIL agreement and running balance.
- Payroll provides employees with accessible information about accrued and used TOIL and resolves discrepancies promptly.
- Records of hours, wages and TOIL agreements are retained for at least seven years in accordance with Fair Work recordkeeping obligations, with access limited to authorised personnel.

TAKING TOIL AND PAYMENT

- TOIL dates are mutually agreed, taking into account employee needs, adequate staffing, required educator-to-child ratios and supervision.
- TOIL is taken as paid time off under the applicable award or agreement, with payroll recording the reduction in balance.
- If TOIL is not taken within the time permitted by the applicable industrial instrument, or the employee requests payment where entitled, the outstanding overtime must be paid at the required overtime rate.
- Any outstanding TOIL entitlement must be reconciled and paid as required by the applicable instrument when employment ends; it cannot simply expire or be forfeited.
- Managers must monitor fatigue, excessive hours and reasonable overtime, and must not pressure staff to work unpaid hours or alter accurate time records.

CHILD SAFETY AND STAFFING

Children's safety, rights and best interests remain the paramount consideration when rostering or approving time off. TOIL must never cause a breach of educator-to-child ratios, qualifications, responsible-person requirements or adequate supervision. The manager must arrange suitable coverage before releasing an educator from duties.

RESPONSIBILITIES

Approved Provider/Management: maintain compliant employment arrangements, payroll controls, safe staffing and oversight of TOIL. Nominated Supervisors/Managers: authorise and verify additional work, ensure ratios and safe coverage, and forward records to payroll. Employees: keep accurate time records, seek approval where practicable, review TOIL agreements and raise discrepancies promptly.

STATUTORY LEGISLATION & CONSIDERATIONS

Fair Work Act 2009 (Cth), National Employment Standards, Fair Work Regulations 2009, applicable Children's Services Award 2010 / Educational Services (Teachers) Award 2020 or enterprise agreement, Work Health and Safety Act 2011 (NSW), Education and Care Services National Law and National Regulations as applied in NSW, and National Quality Standard Quality Area 4.

SOURCES

Fair Work Ombudsman – time off instead of overtime pay, overtime and recordkeeping guidance; Fair Work Commission – current modern awards; SafeWork NSW – managing fatigue; ACECQA – staffing arrangements and adequate supervision.

4.26 Leave Policy

INTRODUCTION

Cubby OOSH recognises the importance of rest, family responsibilities, wellbeing and lawful access to leave. This policy applies across Cubby OOSH before school care, after school care, vacation care and long day care services. Entitlements are determined by the National Employment Standards (NES), applicable modern award or enterprise agreement, employment arrangements and relevant NSW legislation.

PURPOSE AND SCOPE

To provide consistent, fair and confidential processes for requesting, approving, recording and taking annual, personal/carer's, compassionate, parental, community service, family and domestic violence, long service and unpaid leave, as well as public holiday entitlements.

GENERAL LEAVE PROCEDURES

- Employees should submit planned leave through the approved payroll/leave system or Leave Request Form, preferably four weeks ahead where practicable. Shorter notice is considered according to circumstances and legal entitlements.
- Managers must respond within a reasonable time, considering lawful entitlements, service staffing, fairness and operational needs. Statutory leave must not be unreasonably refused or treated as discretionary where the law provides an entitlement.
- For unexpected illness, caring emergencies or other urgent leave, notify the Nominated Supervisor or manager as soon as practicable by an agreed reliable method, including telephone or approved messaging. State the expected period of absence where known.
- Reasonable evidence may be requested in accordance with the Fair Work Act, applicable instrument and privacy requirements. A medical certificate is not the only acceptable evidence in all circumstances; statutory declarations may be suitable.
- Personal health and family information must be kept confidential, with access limited to authorised persons. Records are retained securely in the approved HR/payroll system.

ANNUAL LEAVE

- Full-time employees ordinarily accrue four weeks of paid annual leave per year; part-time employees accrue pro rata. Casual employees do not accrue paid annual leave. Shiftworker entitlements may differ where the applicable instrument provides.
- Annual leave accrues progressively and carries over from year to year. Leave dates are agreed between employee and employer; an employer must not unreasonably refuse a request to take annual leave.
- Annual leave may be taken in shorter periods by agreement; the former blanket minimum of one day does not apply.
- Directions to take excessive accrued annual leave, annual leave during shutdowns and cashing out are only permitted on the terms of the applicable award/agreement and Fair Work Act, including any written agreement requirements.

- Unused accrued annual leave is paid on termination with any applicable leave loading. Public holidays occurring during annual leave are not deducted from annual leave where the employee is entitled to the public holiday.

PERSONAL / CARER'S LEAVE

- Full-time employees accrue 10 days of paid personal/carer's leave per year; part-time employees accrue pro rata, progressively, with unused balances carrying forward. Casual employees have unpaid carer's leave rights under the NES.
- Paid personal leave applies when the employee is unfit for work due to personal illness or injury; carer's leave applies to care/support for an immediate family or household member due to illness, injury or unexpected emergency.
- Eligible employees may access unpaid carer's leave when paid personal/carer's leave is unavailable, subject to NES rules.
- Employees must give notice as soon as practicable and provide reasonable evidence if requested. Absence patterns alone do not establish misconduct; any concern must be managed fairly without undermining lawful leave rights.
- Employees must not attend work while unfit or contrary to applicable infectious disease exclusion requirements.

COMPASSIONATE LEAVE

Eligible full-time and part-time employees receive two days of paid compassionate leave per permissible occasion; casual employees receive two days unpaid. This includes qualifying death, life-threatening illness or injury, stillbirth and miscarriage circumstances under the NES. Notice and reasonable evidence rules apply.

PARENTAL LEAVE

Eligible employees, including qualifying regular and systematic casual employees, may access unpaid parental leave under the NES, including applicable extensions and return-to-work rights. Government-funded Parental Leave Pay is a separate scheme administered under Commonwealth law. Employees should consult the 4.23 Pregnancy Policy and management for individual arrangements.

FAMILY AND DOMESTIC VIOLENCE LEAVE

All employees, including casual employees, are entitled to 10 days of paid family and domestic violence leave each 12-month period under the NES. This is available in full from commencement and renews on the work anniversary; it does not accumulate. Notice and evidence requirements must be applied sensitively. Information must be kept confidential, with pay slips handled in accordance with legal privacy requirements.

COMMUNITY SERVICE LEAVE

Eligible employees may access community service leave for jury service and voluntary emergency management activities in accordance with the NES. Jury duty make-up pay applies where legally required. Employees should give notice and provide evidence as soon as practicable.

LONG SERVICE LEAVE

NSW long service leave entitlements are governed by the Long Service Leave Act 1955 (NSW), including generally two months (8.6667 weeks) after 10 years of continuous service and applicable pro-rata payment provisions after five years in qualifying termination circumstances. Treatment of casual service, breaks, accrual and payment must be assessed under NSW law. Requests and timing are arranged lawfully and reasonably.

LEAVE WITHOUT PAY

Discretionary unpaid leave may be requested in writing and approved by management. Employees are not automatically required to exhaust every paid leave balance before seeking unpaid leave. Effects on accrual and continuous service depend on the type of unpaid leave and applicable law; statutory unpaid leave entitlements are not displaced by this procedure.

PUBLIC HOLIDAYS AND SCHOOL HOLIDAYS

- Employees are entitled to be absent on a public holiday under the NES unless reasonably requested to work; they may refuse an unreasonable request. Eligible permanent employees are paid their base rate for ordinary hours that would otherwise have been worked.
- Public holiday entitlements depend on the employee's actual employment status, ordinary hours and applicable instrument. OOSH educators do not automatically become casual merely because school holidays commence. Any genuine variation in employment arrangements must be lawful and documented.
- Employers must not alter rosters artificially to avoid public holiday entitlements. A public holiday during paid annual or personal leave is generally not deducted from that leave where applicable.

STAFFING, CHILD SAFETY AND RESPONSIBILITIES

Management must plan leave coverage to maintain lawful educator-to-child ratios, adequate supervision, qualified staffing, continuity of care and safe arrival/departure arrangements across all services. Children's safety, rights and best interests remain paramount when making staffing decisions. Leave rights must be respected while management arranges appropriate relief staffing.

Employees must provide accurate requests and notifications, comply with reasonable evidence requirements and update managers about material changes. Nominated Supervisors and Area Managers coordinate coverage; payroll/HR maintain accurate entitlements, payments and confidential records.

LEGISLATION AND REFERENCES

Fair Work Act 2009 (Cth) and National Employment Standards; Children's Services Award 2010 and Educational Services (Teachers) Award 2020 where applicable; Long Service Leave Act 1955 (NSW); Work Health and Safety Act 2011 (NSW); Education and Care Services National Law and National Regulations (NSW); National Quality Standard QA4 and QA7; Privacy Act 1988 (Cth) where applicable.

SOURCES

Fair Work Ombudsman – Leave and public holidays, Family and domestic violence leave, Parental leave; NSW Industrial Relations – Long service leave; ACECQA – National Quality Framework and staffing arrangements.

4.27 PROTECTED DISCLOSURES (WHISTLEBLOWER) POLICY

INTRODUCTION

Cubby OOSH encourages people to speak up about suspected wrongdoing, unsafe conduct and risks to children. Reports will be received respectfully, assessed promptly and managed without retaliation. This policy operates across Cubby OOSH before school care, after school care, vacation care and long day care services.

PURPOSE AND PARAMOUNTCY

The safety, rights and best interests of children are the paramount consideration in decisions about disclosures involving children. Organisational reputation, commercial interests or personal loyalties must never delay protective action, mandatory reporting or lawful cooperation with regulators. The policy explains reporting pathways, protections, fair assessment and confidential recordkeeping.

SCOPE

Applies to current and former educators, employees, managers, approved provider representatives, students, volunteers, contractors, families and other people raising concerns. Different statutory protections apply depending on the discloser, recipient, subject matter and relevant law; this policy does not promise that every complaint automatically qualifies for statutory whistleblower protection.

WHAT CAN BE REPORTED

- Actual or suspected risks to a child's safety, health, rights or wellbeing, including inappropriate discipline, abuse, neglect, inadequate supervision and failure to report.
- Suspected offences against the Education and Care Services National Law or Regulations, unsafe practices, concealment of incidents or regulatory non-compliance.
- Fraud, corruption, serious misconduct, misuse of funds, significant work health and safety risks or retaliation against a person who reports concerns.
- Concerns can be raised without proof. An honestly held concern with reasonable grounds may qualify for protection even if not substantiated. Routine personal employment grievances may be managed under workplace grievance procedures unless a relevant protection also applies.

PROTECTED DISCLOSURES UNDER NSW EDUCATION AND CARE LAW

NSW education and care law provides specific protections for disclosures to the NSW Early Learning Commission in accordance with the National Law, and certain honest disclosures made on reasonable grounds to the regulator or a manager of an approved provider concerning an offence under the National Law or a risk to children's safety, health or wellbeing. Protections depend on the applicable legal criteria. Additional Commonwealth corporate whistleblower protections may apply to eligible persons and qualifying disclosures to eligible recipients under the Corporations Act 2001 (Cth), where relevant to the legal entity.

HOW AND WHERE TO REPORT

- A concern may be raised in person, by telephone or in writing with the Nominated Supervisor, Area Manager, Approved Provider or designated disclosure contact. If that person is implicated or the reporter is uncomfortable, use another manager or report externally.
- Child protection concerns may be reported directly to NSW Police (000 in an emergency), the NSW Child Protection Helpline, the NSW Early Learning Commission or the Office of the Children's Guardian, as appropriate. Internal permission is not required before making a lawful external report.
- Reports can include the issue, dates, people involved, witnesses and available evidence. Anonymous reports are accepted; anonymity can limit investigation or feedback.
- A report to a regulator or external body is not automatically protected under every whistleblower law. Public disclosures to media or social media are not a substitute for prescribed reporting pathways and may not attract statutory protections.

CHILD SAFETY AND IMMEDIATE RESPONSE

Where there is immediate danger, protect the child, contact emergency services and follow child protection, incident and emergency procedures. Management must assess whether a report triggers mandatory child protection reporting, reportable conduct notification, or regulatory notification; these obligations operate independently of the internal disclosure process. No internal investigation may delay a legally required report or compromise an external investigation.

RECEIVING AND ASSESSING DISCLOSURES

- Acknowledge a report as soon as practicable, aiming for five business days when contact details are available; this is a service target, not a statutory guarantee.
- Record the concern securely; assess immediate child-safety, workplace and retaliation risks; identify any statutory reporting duties and conflicts of interest.
- Determine whether a disclosure may qualify for legal protection and appoint an impartial person to assess or investigate it; obtain independent advice where appropriate.
- Preserve evidence, avoid unnecessary interviews of children, and coordinate with Police or regulatory agencies where their investigation could be affected.
- Provide updates and an outcome summary where lawful and practicable, while protecting privacy and procedural fairness.

CONFIDENTIALITY AND PRIVACY

Discloser identities and identifying information must be handled on a strict need-to-know basis and disclosed only with consent or where permitted or required by law. Absolute anonymity or confidentiality cannot be guaranteed in every investigation. Store records in restricted systems, separate from routine staff or child files where appropriate, and comply with legal retention and disclosure requirements.

PROTECTION AGAINST RETALIATION

Cubby OOSH prohibits dismissal, threats, harassment, intimidation, exclusion, discriminatory rostering, reputational harm or other adverse treatment because someone made or proposed to make a protected report. Managers must assess and monitor retaliation risks, offer practical supports and promptly

investigate alleged victimisation. Statutory remedies and immunities depend on the relevant law and are not blanket immunity for the discloser's own misconduct.

FAIRNESS TO ALL PARTIES

People named in reports must be treated fairly and presumed not to have engaged in wrongdoing until facts are assessed. Provide a meaningful opportunity to respond where appropriate and consistent with child safety and external investigation requirements. Do not penalise a person solely because a report was unsubstantiated. Deliberately fabricated reports may be managed under relevant conduct procedures following a fair assessment; mistaken reports made honestly are not misconduct.

CHILDREN AND FAMILIES SPEAKING UP

Children must have accessible, developmentally appropriate ways to raise worries with trusted educators. Educators must listen respectfully, record children's words accurately where appropriate and act promptly. Families can use this policy, the Complaints and Grievances Policy and external reporting channels without fear of retaliation or reduced care for their child.

RESPONSIBILITIES

- Approved Provider/management: provide reporting channels, ensure impartial handling, prevent retaliation, meet statutory reporting duties and monitor systemic trends.
- Nominated Supervisors/Responsible Persons: respond immediately to child safety concerns, preserve information, escalate concerns and support staff and children.
- Educators, staff, students and volunteers: raise concerns promptly, cooperate with lawful enquiries, preserve confidentiality and never discourage external reporting.
- All parties: maintain privacy, avoid speculation and treat others respectfully.

EXTERNAL REPORTING OPTIONS

NSW Early Learning Commission (education and care regulator): https://education.nsw.gov.au/early-childhood-education/regulation-and-compliance. NSW Office of the Children's Guardian: https://ocg.nsw.gov.au. NSW Child Protection Helpline: 132 111. NSW Police: 000 for immediate danger. ASIC: https://asic.gov.au (corporate whistleblower protections where applicable). NSW Ombudsman and ICAC have specific jurisdictions; not all private-service complaints fall within them.

REVIEW AND LEGISLATION

Review at least annually and following relevant legislative changes or serious incidents. Inform families of changes where the National Regulations require notice; a blanket 14-day notice does not apply to every policy amendment. References: Children (Education and Care Services) National Law (NSW); Education and Care Services National Regulations; National Quality Standard QA2, QA4 and QA7; Children's Guardian Act 2019 (NSW); Children and Young Persons (Care and Protection) Act 1998 (NSW); Corporations Act 2001 (Cth), where applicable; Fair Work Act 2009 (Cth); Privacy Act 1988 (Cth), where applicable.

SOURCES

NSW Early Learning Commission – Protected Disclosures Model Policy and child safety reforms; ACECQA – Guide to the National Quality Framework and paramount consideration information sheet; Office of

the Children's Guardian – reportable conduct guidance; ASIC – whistleblower rights and protections; Fair Work Ombudsman – workplace protections.

CUBBYOOSH

ACTIVE & ENGAGING OUT OF SCHOOL HOURS CARE

Quality Area 5

CUBBY OOSH – QUALITY AREA 5 POLICY UPDATE REGISTER

Relationships with Children: September 2026

Policy Number	Policy Name	What Changed – September 2026
5.01	**Interactions & Relationships with Children**	Updated for current QA5 requirements and school-age care practice. Strengthened paramountcy where directly relevant to interactions; child voice, agency and consent; co-regulation and self-regulation; neurodiversity, disability and reasonable adjustments; inappropriate discipline and inappropriate conduct; safe physical intervention; peer relationships; inclusion; family partnerships; objective documentation; and safeguards around early collection, suspension or exclusion. Removed expectations such as required eye contact and automatic exclusion based on incident-form numbers.
5.02	**Guiding Children's Behaviour**	Reframed behaviour as communication and strengthened positive, strengths-based guidance. Added paramountcy for behaviour-support decisions; co-regulation; trauma, sensory, disability and neurodiversity considerations; reasonable adjustments; de-escalation; clear prohibited discipline/conduct; strict limits on physical intervention; behaviour support planning; bullying and peer conflict; family partnerships; and documented, proportionate decision-making before reduced attendance, suspension or exclusion. Removed automatic exclusion after a fixed number of behaviour forms.
5.03	**Inclusion of Children with Additional Needs**	Expanded from general inclusion to a rights-based, barrier-reduction approach for OOSH. Added reasonable adjustments; child and family voice; strengths-based and non-stigmatising practice; disability and neurodiversity; inclusive programming and environments; behaviour/communication supports; privacy; adequate supervision; excursions and transitions; collaboration with school/professionals; current Inclusion Support Program and NSW Inclusion Agency processes; and safeguards before restricting attendance or ending care. Paramountcy included where inclusion decisions affect access, safety, dignity or participation.

5.04	**Anti-Bias, Inclusion & Cultural Diversity**	Updated for MTOP V2.0 cultural responsiveness and current inclusive practice. Strengthened anti-bias and anti-racism approaches; Aboriginal and Torres Strait Islander cultural safety; culturally and linguistically diverse families; inclusive communication and interpreting; disability and neurodiversity; diverse family structures; inclusive celebrations, resources and displays; responding to discriminatory language/behaviour; child voice; educator reflection; and Child Safe Standard 4. Paramountcy included only where decisions directly affect a child's dignity, identity, participation or safety.
5.05	**Gender Equality**	Modernised the policy beyond a male/female-only equality framework. Added equity and inclusion under MTOP V2.0; unconscious gender bias; challenging stereotypes; inclusive language and resources; equitable access to all play and activities; gender diversity; diverse family structures; discrimination and harassment responses; child voice and educator critical reflection. Removed the outdated expectation to recruit an equal balance of male and female educators and replaced it with lawful, merit-based inclusive recruitment. Paramountcy applied where gender-related conduct or decisions affect children.
5.06	**Show & Tell**	Reframed Show & Tell as an optional, child-led leisure experience rather than a compulsory classroom-style activity. Added child agency and the right to pass or use alternative communication; socioeconomic equity; inclusion; culturally responsive sharing; safe items from home; privacy and digital/photo safeguards; family and community connections; programming and reflection; and safety screening for food, animals and natural objects. Paramountcy is used proportionately only where sharing, personal information, items or peer responses affect safety, privacy, dignity or wellbeing.
5.07	**Guns & Superhero Play**	Updated to recognise superhero, fantasy battle and weapon-themed play as legitimate imaginative play when safe and consensual. Added consent and stop boundaries; safe physical play; rules for realistic toy weapons and constructed fantasy props; when educators must intervene; distinguishing fantasy play from credible threats or wellbeing concerns; media/gaming and current-event influences; trauma sensitivity; inclusion and cultural considerations; supervision; family communication; and educator reflection. Paramountcy applies

where play decisions affect children's safety, dignity, participation or wellbeing.

5.01 Interactions & Relationships with Children Policy

INTRODUCTION

Positive, responsive and respectful relationships are central to children's safety, wellbeing, identity, confidence, belonging and participation. In school-age care, relationships with educators and peers are especially important as children develop increasing independence, negotiate friendships, express their views and learn to regulate emotions and behaviour. Cubby OOSH will provide interactions that are warm, equitable, culturally responsive, inclusive and consistent with children's dignity and rights.

PURPOSE

To ensure all interactions and relationships at Cubby OOSH protect children's safety, rights and best interests; maintain each child's dignity; support secure and trusting relationships; promote children's agency and voice; and provide positive, strengths-based guidance that supports self-regulation, social competence and respectful relationships.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisor, Responsible Persons, Educational Leaders, educators, staff, students, volunteers and contractors who interact with children. It applies across before-school care, after-school care, vacation care, excursions, transport and online/digital interactions connected with the service.

PARAMOUNTCY OF CHILDREN'S SAFETY, RIGHTS AND BEST INTERESTS

Interactions with children are a direct and significant area in which the paramountcy principle applies. In every interaction, behaviour-guidance decision and response to a concern, children's safety, rights and best interests will be the paramount consideration. Where these interests conflict with adult convenience, staffing pressures, behaviour management preferences, family requests, reputational concerns or other competing interests, the rights and best interests of the child or children will prevail.

- Children's views and experiences will be listened to and considered in ways appropriate to their age, development, communication and circumstances.
- Educators will act promptly where an interaction, practice or decision may compromise a child's dignity, safety, rights or wellbeing.
- Significant decisions affecting a child, including behaviour-support, exclusion or safety decisions, will document how the child's safety, rights, views and best interests were considered.
- No child will be disadvantaged, shamed, silenced or treated less favourably because raising a concern is inconvenient or may reflect negatively on an adult or the service.

INTERACTIONS WITH CHILDREN

Management, educators and other adults at the service will:

- Create welcoming, relaxed and inclusive environments in which children experience genuine, respectful and equitable interactions.
- Build trusting relationships by being available, attentive, predictable and responsive to children's verbal and non-verbal communication.

- Use calm, respectful and age-appropriate language and tone, including during conflict, dysregulation or challenging situations.
- Listen to children and take their opinions, feelings, concerns and disclosures seriously.
- Support children's agency, independence, self-reliance and self-esteem, including their right to make reasonable choices about play, leisure, participation and social interaction.
- Respect each child's individuality, culture, family, language, identity, abilities, communication style and lived experience.
- Avoid requiring eye contact or physical proximity as a condition of listening, compliance or respect; communication approaches will be responsive to the individual child.
- Model empathy, fairness, consent, respectful disagreement, problem-solving and appropriate boundaries.
- Maintain professional boundaries and avoid favouritism, humiliation, ridicule, sarcasm, intimidation, threats or interactions that could reasonably cause fear or shame.
- Reflect on their own assumptions, biases, emotional responses and use of power when interacting with children.
- Ensure interactions remain observable and accountable while respecting children's legitimate privacy, dignity and developing independence.

CHILDREN'S VOICE, RIGHTS AND PARTICIPATION

- Children will be encouraged to express themselves, their opinions and their preferences without fear of punishment or ridicule.
- Children will have meaningful opportunities to contribute to rules, routines, activities, environments and decisions that affect them.
- Educators will explain decisions and limits in language children can understand and, where possible, offer genuine choices and alternatives.
- A child's refusal, discomfort or request for space will be respected where it is safe to do so. Educators will not force affection, hugs, physical contact, participation or public discussion.
- Children will be supported to identify trusted adults and to raise concerns, including concerns about an educator, peer or service practice.
- Children who communicate differently will be provided with appropriate ways to express preferences, needs, feelings and concerns.

POSITIVE GUIDANCE, CO-REGULATION AND SELF-REGULATION

Behaviour is understood as communication and will be responded to in context. Educators will use positive, strengths-based and relational approaches that help children feel safe, understand expectations, regulate emotions and develop skills for resolving conflict.

- Consider possible triggers, unmet needs, sensory factors, communication needs, disability, trauma, fatigue, hunger, environment, peer dynamics and developmental factors before responding.
- Co-regulate through calm presence, reduced language, reassurance, appropriate space, movement, sensory or quiet options and other individualised strategies.
- Use clear, reasonable and consistent expectations that focus on safety and respect rather than obedience for its own sake.
- Describe the behaviour or safety issue rather than labelling the child as 'naughty', 'bad', 'difficult' or similar.

- Redirect, problem-solve, offer choices, adjust the environment and support repair or reconnection after conflict.
- Support children to understand how actions affect others without forcing apologies, affection or public confession.
- Use individual behaviour-support plans where reasonable and helpful, developed with the child and family and, where appropriate and authorised, relevant professionals or Inclusion Support.
- Review strategies regularly and adjust them when they are ineffective or are causing distress, exclusion or escalation.

INAPPROPRIATE DISCIPLINE AND INAPPROPRIATE CONDUCT

Cubby OOSH does not permit corporal punishment, unreasonable discipline or inappropriate conduct towards a child. This expectation applies regardless of a child's behaviour, the level of stress in the environment or an adult's intent.

- No hitting, smacking, shaking, rough handling, painful physical contact or physical punishment.
- No yelling at, swearing at, insulting, belittling, mocking, humiliating, threatening, intimidating or deliberately frightening a child.
- No prolonged, punitive or degrading isolation, exclusion from the group, forced silence or removal of normal rights as punishment.
- Food, water, toileting, rest, access to required medication or contact with a parent/authorised nominee will never be withheld as punishment.
- Physical activity, cleaning or other tasks will not be imposed as punishment.
- Children will not be required to remain seated or separated for excessive periods merely for distraction, non-compliance or behaviour that can be addressed through supportive strategies.
- Concerns about inappropriate conduct will be reported and escalated promptly in accordance with child protection, complaints and reportable conduct procedures.

DE-ESCALATION AND SAFETY RESPONSE

- When behaviour creates an immediate safety concern, educators will first use de-escalation, environmental changes, increased supervision, removal of hazards and support from other educators where practicable.
- Other children may be calmly moved to a safer area when this is the least disruptive and safest response.
- A child may be supported to move to a quieter or safer space, but this must not become punitive isolation. Appropriate supervision, connection and support will be maintained.
- The response will be proportionate to the actual risk and will preserve the child's dignity as far as possible.

PHYSICAL INTERVENTION

Physical intervention is not a behaviour-management strategy. In a rare emergency where there is an immediate risk of harm and less restrictive measures are not sufficient, an educator may use only the minimum reasonable and proportionate physical action necessary to prevent immediate harm. Any intervention must cease as soon as the immediate danger has passed.

- Physical intervention must never be used for punishment, compliance, convenience, retaliation or because a child is verbally challenging, refusing an activity or attempting to disengage where there is no immediate risk of harm.

- The child's breathing, circulation, airway, head, neck and dignity must never be compromised. Educators must not use dangerous restraint methods.
- Following any physical intervention, the child's wellbeing will be checked, first aid or medical assistance provided where required, the Nominated Supervisor informed, the family notified as appropriate, and the event documented and reviewed.
- The service will consider whether notification to the Regulatory Authority, Office of the Children's Guardian, Police or another authority is required.
- Repeated reliance on physical intervention will trigger immediate review of the child's supports, environment, supervision and risk-management arrangements.

RELATIONSHIPS BETWEEN CHILDREN

- Children will be supported to build friendships, collaborate, negotiate, include others and resolve conflict respectfully.
- Educators will actively address bullying, harassment, discrimination, coercion, intimidation, harmful sexual behaviour and other conduct that compromises another child's safety or dignity.
- Conflict will not automatically be treated as misconduct; educators will distinguish ordinary disagreement from patterns of harm, power imbalance or targeted behaviour.
- Group size, composition, noise, stimulation, environment and individual needs will be considered when planning experiences and supervision.
- Children will not be forced to be friends, share personal belongings, hug, apologise or continue an interaction that makes them feel unsafe or uncomfortable.

INCLUSION AND EQUITABLE INTERACTIONS

- All children will be treated equitably and with respect regardless of disability, culture, language, religion, family structure, gender, identity, socioeconomic circumstances or other personal characteristics.
- Reasonable adjustments and individual communication or regulation supports will be provided where required so children can participate meaningfully.
- Behaviour associated with disability, communication difference, trauma or additional needs will not be treated as deliberate misconduct without consideration of the child's circumstances and support needs.
- Educators will work with families and authorised professionals while maintaining the child's dignity, privacy and right to be heard.

INTERACTIONS WITH FAMILIES

- Families will be treated respectfully, equitably and without judgement, and communication will be open, professional and culturally responsive.
- Information about another child or family will not be disclosed to a family except where legally authorised or required.
- Families will be consulted about their child's strengths, needs, communication, culture and effective support strategies; however, a family request will not be implemented if it conflicts with a child's safety, dignity, rights or best interests.
- Concerns about a child's interactions or behaviour will be discussed factually and respectfully, focusing on support and partnership rather than blame.
- Interpreting, translated information or alternative communication methods will be considered where needed to support meaningful participation.

INTERACTIONS BETWEEN EDUCATORS AND OTHER ADULTS

- Adults will model respectful, professional communication and resolve disagreements away from children where possible.
- Staff must not undermine, ridicule, shout at or intimidate colleagues in front of children.
- Any educator who observes conduct towards a child that may be unsafe, inappropriate or inconsistent with this policy is expected to act, report and escalate the concern rather than remain silent.
- Professional reflection, supervision, staff meetings and training will be used to strengthen interactions and child-safe practice.

EXCLUSION, SUSPENSION OR EARLY COLLECTION

Exclusion, suspension, reduced attendance or a request for early collection will not be used as routine punishment. Where a child's behaviour creates a serious or ongoing safety risk, decisions will be individualised, proportionate and based on documented risk, reasonable supports and the paramountcy of the safety, rights and best interests of all affected children.

- The service will consult with the child and family, consider reasonable adjustments and inclusion supports, and review environmental, staffing and supervision factors where practicable.
- A fixed number of behavioural incident forms will not automatically trigger exclusion.
- Immediate collection or temporary exclusion may be necessary where an immediate risk cannot be safely managed, but the reasons and decision-making process will be documented.
- Longer-term enrolment decisions will consider applicable discrimination obligations, inclusion options, the child's rights and best interests, the safety and rights of other children, and the service's capacity to provide safe care.
- Clear re-entry/support arrangements will be established where a child returns following a temporary exclusion.

DOCUMENTATION, REPORTING AND REVIEW

- Significant interaction, behaviour or safety incidents will be documented objectively, including antecedents/context, strategies used, the child's response, injuries or impacts, family communication and follow-up actions.
- Records will avoid stigmatising labels and distinguish observed facts from interpretation.
- Patterns of incidents will be reviewed to identify environmental, relational, program, staffing or individual support changes that may reduce recurrence.
- Child protection concerns, allegations against staff, inappropriate conduct and reportable conduct matters will be managed under the relevant Cubby OOSH policies and statutory reporting requirements.
- Privacy and confidentiality will be maintained while still sharing information where necessary to protect children or meet legal obligations.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including current paramount consideration requirements, section 166 (inappropriate discipline), section 166A (inappropriate conduct) and section 167 (protection from harm and hazards), as applicable.

- Education and Care Services National Regulations, including regulation 155 (interactions with children), regulation 156 (relationships in groups) and regulation 168(2)(j) (policies and procedures relating to interactions with children).
- National Quality Standard - Quality Area 5: Standard 5.1 Relationships between educators and children; Elements 5.1.1 Positive educator to child interactions and 5.1.2 Dignity and rights of the child; Standard 5.2 Relationships between children; Elements 5.2.1 Collaborative learning and 5.2.2 Self-regulation.
- Children's Guardian Act 2019 (NSW), Child Safe Standards and Reportable Conduct Scheme, where applicable.
- Child Protection (Working with Children) Act 2012 (NSW), where applicable.
- Disability Discrimination Act 1992 (Cth) and other applicable anti-discrimination obligations.
- United Nations Convention on the Rights of the Child.

SOURCES

- ACECQA - Guide to the National Quality Framework and Quality Area 5 guidance, current 2026 resources.
- ACECQA - Information Sheet: Relationships with children.
- ACECQA - Information Sheet: Supporting children to regulate their own behaviour.
- ACECQA - Information Sheet: Inappropriate discipline.
- ACECQA - Information Sheet: Understanding paramount consideration.
- NSW Early Learning Commission - Paramountcy in practice and 2026 child safety reforms.
- My Time, Our Place: Framework for School Age Care in Australia V2.0.
- NSW Office of the Children's Guardian - Child Safe Standards.

5.02 Guiding Children's Behaviour Policy

INTRODUCTION

Children's behaviour is a form of communication and is influenced by development, relationships, environment, culture, disability, communication, sensory needs, experiences, emotions, fatigue, hunger, stress and many other factors. Cubby OOSH uses positive, respectful and strengths-based guidance to help children feel safe, develop self-regulation, solve problems and build respectful relationships. Behaviour guidance is not punishment.

PURPOSE

To provide a consistent, child-safe and inclusive approach to guiding behaviour that maintains children's dignity and rights, promotes self-regulation and social competence, prevents inappropriate discipline or conduct, and supports educators to respond safely and proportionately when behaviour presents risk.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisor, Responsible Persons, educators, staff, students, volunteers and contractors who interact with children across before-school care, after-school care, vacation care, excursions, transport and other service activities.

PARAMOUNTCY OF CHILDREN'S SAFETY, RIGHTS AND BEST INTERESTS

Behaviour guidance directly affects children's dignity, safety and rights. In all decisions and actions under this policy, the safety, rights and best interests of children will be the paramount consideration. Where these interests conflict with adult convenience, staffing pressures, a desire for immediate compliance, family requests, operational preferences or reputational concerns, the rights and best interests of the child or children will prevail.

- Children's views, experiences and communication will be considered when understanding behaviour and planning supports.
- Significant behaviour-support, exclusion, reduced-attendance or safety decisions will record how children's safety, rights and best interests were considered.
- The safety and rights of all affected children will be considered, including the child displaying behaviour and children who may be at risk of harm.

GUIDING PRINCIPLES

- Behaviour is viewed as communication rather than a label or character flaw.
- Educators will seek to understand what happened before, during and after behaviour and identify possible triggers, needs, strengths and protective factors.
- Children will receive clear, reasonable and age-appropriate expectations with positive guidance and encouragement.
- Guidance will be individualised and take account of family and cultural values, age, development, disability, communication, sensory needs and abilities.
- Children will be supported to develop self-reliance, self-esteem, emotional literacy, self-regulation, problem-solving and respectful conflict resolution.
- Educators will model the calm, respectful behaviour they expect from children.
- Participation in repair or restorative conversations will be supported but not forced while a child is distressed or dysregulated.

PREVENTION AND PROACTIVE PRACTICE

- Create predictable routines while allowing flexibility and child choice appropriate to school-age care.
- Provide engaging, age-appropriate leisure experiences, sufficient resources and a balance of active, social and quiet options.
- Use supervision plans and educator positioning to identify emerging conflict or dysregulation early.
- Consider noise, crowding, heat, transitions, waiting, boredom, hunger, fatigue, sensory load and group dynamics when behaviour changes.
- Develop expectations with children where practical and explain the safety or respect reasons behind boundaries.
- Use visual supports, first-then language, choices, movement breaks, quiet spaces or other strategies where helpful to an individual child.
- Build secure relationships so children have trusted adults they can approach before situations escalate.

POSITIVE GUIDANCE AND CO-REGULATION

- Approach children calmly and respectfully and use the least amount of language needed during heightened moments.
- Acknowledge feelings without approving unsafe behaviour; for example, an educator may validate that a child is angry while still setting a clear safety limit.
- Describe what the child can do rather than relying only on prohibitions.
- Offer genuine choices where possible and allow reasonable processing time.
- Redirect or adjust an activity, environment or group arrangement when this is likely to reduce escalation.
- Support children to identify feelings, communicate needs and develop alternative ways to respond.
- Offer appropriate regulation strategies such as space, movement, sensory activities, breathing, music, drawing, quiet play or connection with a trusted educator.
- Physical affection such as a hug will only be offered or provided when appropriate and welcomed by the child.
- After an incident, reconnect with the child and review what may help next time without shame, public interrogation or forced apology.

WHEN BEHAVIOUR MAY CAUSE HARM

- Educators will prioritise immediate safety while remaining calm and using proportionate responses.
- Hazards may be removed and other children may be moved to a safer area if this is the least disruptive way to reduce risk.
- The child may be supported to move to a quieter or safer location, but this must not become punitive or degrading isolation. Appropriate supervision and connection will continue.
- Educators will use de-escalation, co-regulation, environmental changes and support from other educators before considering any physical intervention where practicable.

- First aid and medical assistance will be provided where injury occurs, and relevant incident, family-notification and regulatory-notification requirements will be followed.

INAPPROPRIATE DISCIPLINE AND INAPPROPRIATE CONDUCT

Cubby OOSH prohibits corporal punishment, unreasonable discipline and conduct that a reasonable person would consider inappropriate in an education and care service.

- No hitting, smacking, shaking, rough handling, painful physical contact or physical punishment.
- No aggressive yelling, swearing at a child, threatening, intimidating, mocking, humiliating, insulting, belittling or sarcastic conduct.
- No force-feeding or withholding food, water, toileting, medication, rest or other basic needs as a way to control behaviour.
- No prolonged, punitive or degrading isolation or exclusion from the group.
- No forcing a child to remain seated, silent or separated for excessive periods as punishment.
- No physical activity, cleaning or unpleasant task imposed as punishment.
- No discussion of a child in a derogatory manner in the child's presence or in the presence of other children.
- No retaliation or adverse treatment because a child reports a concern, refuses unwanted contact or challenges an adult's decision.

PHYSICAL INTERVENTION

Physical intervention is not a behaviour-management strategy. In a rare emergency involving an immediate risk of harm, and where less restrictive options are not sufficient, an educator may use only the minimum reasonable and proportionate physical action necessary to prevent immediate harm. The intervention must stop as soon as the danger has passed.

- Physical intervention must never be used to obtain compliance, punish, retaliate, move a child for convenience or respond solely to verbal refusal or non-compliance.
- Any action must preserve the child's dignity and must not compromise breathing, airway, circulation, head or neck safety.
- Following an intervention, the child's wellbeing will be checked and first aid or medical assistance provided if required.
- The event will be documented, the Nominated Supervisor informed, the family notified as appropriate, and the circumstances reviewed.
- The service will consider whether the incident requires notification to the Regulatory Authority, Office of the Children's Guardian, Police or another authority.
- Repeated physical interventions will trigger immediate review of the child's supports, environment, supervision and risk-management arrangements.

BEHAVIOUR SUPPORT PLANNING

- Where behaviour is persistent, complex or creates repeated safety concerns, the service may develop an individual positive behaviour support plan with the child and family.
- Plans will identify strengths, interests, communication preferences, known triggers, preventative strategies, regulation supports, safe responses and review arrangements.
- The child's views will be sought and incorporated in a developmentally appropriate way.

- With appropriate consent, the service may collaborate with Inclusion Support, school staff or relevant health/allied-health professionals.
- Plans will avoid punitive reward-and-consequence systems where these do not meet the child's needs and will be reviewed if strategies are ineffective or increase distress.
- Information will be shared only with people who need it to safely support the child and in accordance with privacy requirements.

INCLUSION, DISABILITY AND REASONABLE ADJUSTMENTS

- Educators will consider whether behaviour may be connected with disability, neurodivergence, communication, sensory processing, trauma, anxiety, cultural differences or unmet support needs.
- Children will not be punished for disability-related behaviour or communication differences without consideration of reasonable adjustments and individual circumstances.
- The service will make reasonable adjustments where required and practicable to support participation and safety.
- Expectations will be adapted where necessary while maintaining essential safety boundaries.

BULLYING, AGGRESSION AND PEER CONFLICT

- Ordinary disagreements and isolated conflict will be distinguished from bullying, which generally involves repeated harmful behaviour and a power imbalance.
- Biting, hitting, kicking, pushing, throwing objects, intimidation and other unsafe behaviour will be interrupted promptly and safely.
- Educators will attend first to anyone injured or distressed and then support all children involved without labelling a child as aggressive, violent, bad or naughty.
- Children will not be made responsible for providing first aid or comforting another child as a compulsory consequence.
- Patterns of peer conflict or harm will be reviewed for supervision, environment, group dynamics, child-support and program changes.

FAMILY PARTNERSHIPS

- Families will be informed of significant incidents concerning their child and consulted about effective support strategies.
- Communication will be factual, respectful and focused on the child's needs and safety rather than blame.
- Confidential information about another child will not be disclosed.
- Family views are important, but the service will not implement a requested strategy that conflicts with a child's dignity, rights, safety or best interests.

EARLY COLLECTION, SUSPENSION OR EXCLUSION

Early collection, reduced attendance, suspension or exclusion will not be used as automatic consequences for behaviour or triggered by a fixed number of incident forms. These measures may only be considered where there is a documented serious or ongoing safety concern that cannot be safely managed through reasonable and proportionate supports.

- The service will consider the child's views, family consultation, reasonable adjustments, inclusion supports, environmental changes, staffing and supervision arrangements before longer-term exclusion decisions where practicable.
- Immediate collection may be requested where an immediate safety risk cannot be safely managed, but the reason and decision will be documented.
- Decisions will consider the rights and best interests of the child concerned as well as the safety and rights of other children.
- Applicable discrimination obligations will be considered before reducing or ending a child's access to the service.
- Where a temporary exclusion occurs, clear return-to-service and support arrangements will be developed.

Behaviour Management and Suspension Process

Where a child displays ongoing or significant behaviours that impact their own safety, the safety of other children or educators, or the service's ability to safely support the child, Cubby OOSH may use the following staged behaviour management process:

1. **Behaviour Report**
   A Behaviour Report will be completed to document the incident, including the behaviour observed, circumstances surrounding the incident, strategies used by educators, the child's response and any follow-up required. The child's parent/carer will be informed, and strategies to support the child will be discussed where appropriate.

2. Second Behaviour Report and Suspension Warning

Where serious or ongoing unsafe behaviour continues despite reasonable support strategies being implemented, a further Behaviour Report may be completed and the parent/carer may be issued with a **Suspension Warning**. The warning will outline the safety concerns, strategies and reasonable adjustments already implemented or considered, and any further actions required to support the child and maintain safety.

3. Third Behaviour Report and Suspension

Where there remains a documented serious or ongoing safety concern that cannot be safely managed through reasonable and proportionate supports, the service may determine that a **temporary suspension** is necessary. The decision will be made in consultation with management and the family where practicable and will consider the child's individual circumstances, views, reasonable adjustments, inclusion supports, rights and best interests, as well as the safety and rights of other children and educators.

Return to Service – Behaviour Action Plan

Following a suspension, and prior to or upon the child's return to care, a **Behaviour Action Plan will be developed in consultation with the child's family**. Where appropriate, the child, school, Inclusion Support and relevant allied health professionals may also contribute. The plan will identify known triggers, preventative strategies, reasonable adjustments, regulation supports, agreed responses to unsafe behaviour, communication arrangements and review timeframes.

Importantly, **these stages are a guide and are not an automatic "three strikes" system**. Depending on the seriousness of an incident, the service may move directly to a suspension warning, request immediate

collection or consider temporary suspension where necessary to manage an immediate or significant safety risk. Conversely, multiple Behaviour Reports will not automatically result in suspension where the child can continue to be safely supported.

DOCUMENTATION, REPORTING AND REFLECTION

- Significant incidents will be documented objectively, including context, observed behaviour, strategies used, the child's response, injury or impact, family communication and follow-up.
- Records will distinguish observed facts from assumptions and avoid stigmatising language.
- Patterns will be reviewed to identify changes that may prevent recurrence.
- Concerns about educator conduct, inappropriate discipline, inappropriate conduct, child abuse or neglect will be reported under Cubby OOSH child protection, complaints and reportable conduct procedures.
- Educators will use critical reflection and professional discussion to review their own responses, triggers, tone, expectations and use of power.

RESPONSIBILITIES

- The Approved Provider will ensure systems, policies, training and oversight support lawful, child-safe behaviour guidance.
- The Nominated Supervisor/Responsible Person will support educators, review significant incidents, ensure required notifications occur and escalate concerns about inappropriate conduct or discipline.
- Educators, staff, students and volunteers will follow this policy, seek support early, report unsafe or inappropriate conduct and participate in reflective review.
- All adults must act when they observe behaviour-guidance practices that may compromise a child's dignity, safety or rights.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including current NSW paramount consideration requirements, section 166 - inappropriate discipline, section 166A - inappropriate conduct, and section 167 - protection from harm and hazards.
- Education and Care Services National Regulations, including regulation 155 - interactions with children, regulation 156 - relationships in groups, and regulation 168 - required policies and procedures.
- National Quality Standard - Quality Area 5, including Element 5.1.1 Positive educator to child interactions, Element 5.1.2 Dignity and rights of the child, Element 5.2.1 Collaborative learning and Element 5.2.2 Self-regulation.
- Children's Guardian Act 2019 (NSW), Child Safe Standards and Reportable Conduct Scheme, where applicable.
- Disability Discrimination Act 1992 (Cth) and other applicable anti-discrimination requirements.
- United Nations Convention on the Rights of the Child.

SOURCES

- ACECQA - Guide to the National Quality Framework, current 2026 edition.
- ACECQA - QA5 Information Sheet: Supporting children to regulate their own behaviour.
- ACECQA - QA5 Information Sheet: Inappropriate discipline.
- ACECQA - Information Sheet: Inappropriate conduct, February 2026.
- ACECQA - Information Sheet: Understanding paramount consideration.
- NSW Early Learning Commission - Child safety reforms and Paramountcy in practice.
- My Time, Our Place: Framework for School Age Care in Australia V2.0.
- NSW Office of the Children's Guardian - Child Safe Standards.

5.03 Inclusion of Children with Additional Needs Policy

INTRODUCTION

Cubby OOSH is committed to inclusive school-age care where every child is welcomed, valued, respected and supported to participate meaningfully. Inclusion is not simply a child's physical presence at the service; it requires the service to identify and address barriers to access, participation, belonging and positive outcomes. Children may require additional support for many reasons, including disability, developmental or communication differences, medical needs, neurodivergence, sensory needs, trauma, social or emotional needs, cultural or language considerations, or changing life circumstances.

PURPOSE

To ensure Cubby OOSH provides equitable and inclusive opportunities for children with additional needs, works in genuine partnership with children and families, makes reasonable adjustments where required, and uses available inclusion supports to reduce barriers while maintaining the safety, dignity, rights and best interests of all children.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisor, Responsible Persons, Educational Leaders, educators, staff, students, volunteers and contractors. It applies to enrolment, orientation, programming, environments, behaviour support, excursions, vacation care, transitions, communication, staffing and participation in all service experiences.

INCLUSION PRINCIPLES

- Every child has the right to be treated with dignity, respect and equity and to have genuine opportunities to access, participate and belong.
- Inclusion will focus on identifying and reducing barriers in the environment, program, routines, communication, attitudes and service practices rather than treating the child as the problem.
- A diagnosis is not required before educators begin reasonable, practical strategies to support a child's participation.
- Children will be viewed through a strengths-based lens. Records and discussions will avoid deficit-based or stigmatising language.
- Children with additional needs will have access to the same play, leisure, social and learning opportunities as their peers, with reasonable adjustments where required.
- Supports will be individualised. A strategy that assists one child will not automatically be appropriate for another child with the same diagnosis or support need.

PARAMOUNTCY OF CHILDREN'S SAFETY, RIGHTS AND BEST INTERESTS

Inclusion decisions can directly affect a child's access, dignity, safety and participation, so the paramountcy principle is relevant to this policy. Children's safety, rights and best interests will be the paramount consideration when making decisions about adjustments, supports, staffing, participation, reduced attendance, suspension or enrolment.

- A child's safety, rights and best interests will not be displaced solely by cost, administrative convenience, staffing preference or reputational concerns.

- The safety and rights of other children will also be considered where a child's support needs involve foreseeable risks to others.
- Children's views will be sought and considered in ways appropriate to their age, development and communication.
- Significant decisions that restrict a child's participation will document the reasons, alternatives considered, supports attempted and how the child's safety, rights and best interests were considered.

ENROLMENT AND ORIENTATION

- Families will be welcomed to share information that will help the service understand their child's strengths, interests, communication, routines, health needs, sensory preferences, regulation strategies and support needs.
- The service will not require unnecessary diagnostic or medical information where practical support needs can be identified without it.
- Where medical conditions, medication, allergies, disability-related health needs or other regulated matters apply, the relevant Cubby OOSH medical and risk-minimisation procedures will also be followed.
- Orientation may be adjusted to suit the child, including additional visits, visual information, gradual familiarisation, meetings with key educators or other transition supports.
- Enrolment and participation decisions will comply with applicable anti-discrimination obligations. Disability or additional needs will not, by themselves, be a reason to refuse access to the service.

CHILD AND FAMILY PARTNERSHIPS

- Families are recognised as important sources of knowledge about their child and will be consulted respectfully about strategies that are effective at home, school or in other settings.
- The child will be included in planning and review wherever possible, including choosing preferred supports, identifying trusted educators and communicating what helps or does not help.
- Educators will communicate about strengths and progress as well as challenges.
- Family preferences will be considered, but a requested strategy will not be used if it conflicts with a child's dignity, safety, rights, legal requirements or best interests.
- Families may be provided with information about external supports, but the service will not diagnose a child or pressure a family to pursue a particular diagnosis or therapy.

REASONABLE ADJUSTMENTS AND ACCESS

- The service will consider reasonable adjustments to enable equitable access and participation for children with disability or additional needs.
- Adjustments may include changes to routines, communication, activity design, group size, environment, transitions, seating, sensory supports, visual supports, equipment, supervision arrangements or educator approaches.
- Adjustments will be discussed with the child and family and reviewed for effectiveness.
- Access to play spaces, equipment and activities will be maximised. Restrictions will be based on an individual and current risk assessment rather than assumptions about disability or diagnosis.
- Where a requested adjustment cannot reasonably be implemented, the service will document the reasons, explore alternatives and continue working with the family to identify practicable options.

PROGRAMMING AND ENVIRONMENT

- Programming will reflect My Time, Our Place V2.0 and provide flexible, leisure-based opportunities that allow different ways to participate.
- Educators will provide choice rather than expecting all children to participate in the same activity, group or method of engagement.
- Resources and environments will include positive and respectful representations of disability, neurodiversity, culture, family diversity and different ways of communicating and participating.
- Educators will consider sensory load, noise, lighting, crowding, transitions, waiting times, physical accessibility and predictable routines when planning environments.
- Quiet spaces, movement opportunities and regulation resources may be available to all children where practical, reducing stigma around individual supports.
- Specialist or adaptive equipment will be used safely and in accordance with relevant instructions and individual needs.

BEHAVIOUR, COMMUNICATION AND REGULATION SUPPORT

- Behaviour will be understood as communication and considered in the context of disability, neurodivergence, sensory needs, communication, trauma, fatigue, environment and other relevant factors.
- Children will not be punished for disability-related behaviour or communication differences without consideration of reasonable adjustments and individual circumstances.
- Educators will use co-regulation, positive guidance, communication supports, environmental adjustments and individual strategies consistent with the Guiding Children's Behaviour Policy.
- Children will not be forced to make eye contact, accept physical affection, communicate verbally when another effective communication method is available, or participate in sensory experiences that cause avoidable distress.
- Where a Positive Behaviour Support Plan or similar plan is used, it will focus on strengths, prevention, communication, regulation and safety and will be reviewed with the child and family.

INCLUSION SUPPORT PROGRAM

Where eligible and appropriate, Cubby OOSH may access the Australian Government Inclusion Support Program (ISP). The ISP supports eligible education and care services, including Outside School Hours Care, to identify and address barriers to inclusion and build inclusive practice.

- The service will work with the NSW Inclusion Agency to identify barriers and develop or maintain the service's Strategic Inclusion Plan.
- As at July 2026, KU Children's Services is the Inclusion Agency for NSW under the national ISP.
- The Inclusion Agency may provide professional support and access to the Specialist Equipment Library.
- Where barriers cannot be addressed through professional support or specialist equipment, eligible services may apply through the Inclusion Support Portal for Inclusion Development Fund support.
- Funding may include additional educator support, immediate/time-limited support or other eligible funding streams under the current ISP Guidelines.
- ISP funding supports inclusion and does not replace the service's existing responsibility to provide inclusive practice or reasonable adjustments.
- Family consent and applicable privacy requirements will be followed before personal information is shared for ISP support.

COLLABORATION WITH PROFESSIONALS AND SCHOOL

- With appropriate family consent, the service may collaborate with Inclusion Professionals, allied health practitioners, caseworkers, school staff or other relevant professionals.
- Advice from professionals will be considered in the OOSH context; strategies will not be copied automatically from school, therapy or home if they are not suitable for a leisure-based school-age care environment.
- Educators remain responsible for professional judgement, supervision, child-safe practice and implementation within the service.
- Information sharing will be limited to what is necessary and authorised, except where disclosure is required or permitted by law to protect a child.

PRIVACY, CONFIDENTIALITY AND DIGNITY

- Information about a child's disability, diagnosis, health, behaviour or support needs is private and will only be shared with people who require the information for lawful and appropriate purposes.
- Children will not be discussed in front of other children or families in a way that discloses private information or undermines dignity.
- Educators may answer children's general questions about diversity and different ways people communicate or participate without disclosing another child's diagnosis or confidential information.
- Support plans and sensitive records will be stored securely and accessed only by authorised people.

STAFFING AND SUPERVISION

- The service will consider the child's individual needs, environment, group dynamics and foreseeable risks when planning supervision.
- The minimum educator-to-child ratio does not by itself determine whether supervision is adequate for a particular child, activity or environment.
- Where additional staffing would address an identified barrier, the service may explore ISP funding, roster adjustments or other reasonable strategies.
- The presence or absence of external inclusion funding will not be the sole basis for determining whether a child can attend; the service will assess what reasonable supports can be provided and document significant decisions.

EXCURSIONS, VACATION CARE AND TRANSITIONS

- Children with additional needs will be included in excursions and vacation-care experiences wherever this can be achieved safely with reasonable adjustments.
- Excursion risk assessments will consider individual communication, mobility, sensory, medical, behavioural and supervision needs without unnecessarily identifying or stigmatising the child in public-facing documents.
- Transition planning may include school-to-OOSH handover arrangements, visual supports, preferred educators, transport considerations, safe-arrival procedures and changes to routine.
- A child will not automatically be excluded from an excursion because they require additional support; individual risk and reasonable adjustments will be considered.

RESTRICTING ATTENDANCE, SUSPENSION OR ENDING CARE

Reduced attendance, early collection, suspension or ending care will not be used simply because a child has disability or additional needs, because inclusion funding is unavailable, or because the child requires adjustments.

- Where there is a serious or ongoing safety concern, the service will consider reasonable adjustments, inclusion supports, environmental changes, staffing and supervision options before longer-term restrictions where practicable.
- Any restriction will be individualised, proportionate and based on current documented circumstances rather than diagnosis or assumptions.
- The child and family will be consulted, and the child's views considered where possible.
- Applicable disability discrimination and other legal obligations will be considered before a decision to reduce or end access.
- Where an immediate risk cannot be safely managed, early collection or temporary restriction may be necessary; the reasons, actions and review arrangements will be documented.

RESPONSIBILITIES

- The Approved Provider will support inclusive governance, reasonable adjustments, staff capability and access to available inclusion programs.
- The Nominated Supervisor/Responsible Person will coordinate individual supports, family consultation, referrals to the Inclusion Agency where appropriate, risk management and review.
- The Educational Leader will support inclusive programming and critical reflection under MTOP V2.0.
- Educators will know and implement relevant individual strategies, communicate respectfully, identify barriers early and seek support when needed.
- All adults at the service will challenge discriminatory, exclusionary or stigmatising practices and protect children's dignity and privacy.

Where behaviour presents a serious or ongoing safety concern, the behaviour management and suspension process outlined in the Guiding Children's Behaviour Policy will be followed. This may include a Behaviour Report, Behaviour Report and Suspension Warning, and where necessary, Behaviour Report and Suspension. These stages are not an automatic consequence system and decisions will be based on the individual circumstances, level of risk, supports and reasonable adjustments available.

Families will be encouraged to actively participate in the development, implementation and review of individual support, behaviour and risk-management strategies. Where information, consent or family participation is necessary to safely support the child, the service will clearly communicate what is required and why. Where this cannot be obtained, the service will document attempts to engage the family and assess what supports can reasonably and safely continue to be provided.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including current paramount consideration requirements and section 167 - protection from harm and hazards.

- Education and Care Services National Regulations, including regulation 73 - educational program; regulations 155 and 156 - interactions and relationships; and relevant health, safety, supervision and policy requirements.
- National Quality Standard - Quality Area 1 Educational Program and Practice; Quality Area 2 Children's Health and Safety; Quality Area 3 Physical Environment; Quality Area 5 Relationships with Children; Quality Area 6 Collaborative Partnerships with Families and Communities; and Quality Area 7 Governance and Leadership.
- My Time, Our Place: Framework for School Age Care in Australia V2.0.
- Disability Discrimination Act 1992 (Cth), including applicable reasonable adjustment and disability discrimination obligations.
- Anti-Discrimination Act 1977 (NSW), as applicable.
- Children's Guardian Act 2019 (NSW) and NSW Child Safe Standards, where applicable.
- Australian Government Inclusion Support Program Guidelines, current September 2026 edition.

SOURCES

- Australian Government Department of Education - Inclusion Support Program and current Inclusion Support Program Guidelines.
- Australian Government Department of Education - Inclusion Agencies and Inclusion Development Fund guidance.
- ACECQA - Guide to the National Quality Framework, current 2026 edition.
- ACECQA - National Quality Standard and My Time, Our Place V2.0 resources.
- Australian Human Rights Commission - Disability discrimination guidance.
- KU Children's Services - NSW Inclusion Agency resources.
- Cubby OOSH Philosophy and related inclusion, behaviour, medical and child-safe policies.

5.05 Gender Equality Policy

INTRODUCTION

Cubby OOSH is committed to gender equality and to creating a school-age care environment where children are respected as individuals and are free to participate, play, express themselves and develop interests without restrictive gender stereotypes. Gender equality is part of equitable, inclusive and child-safe practice and supports children's identity, belonging, agency, dignity and wellbeing.

PURPOSE

To ensure children have equitable opportunities regardless of gender; educators actively identify and challenge gender stereotypes and bias; resources, language and expectations are inclusive; and children are protected from gender-based discrimination, harassment, bullying or exclusion.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisor, Responsible Persons, Educational Leaders, educators, staff, students, volunteers and contractors across before-school care, after-school care, vacation care, excursions and other Cubby OOSH activities.

GUIDING PRINCIPLES

- Equity means providing fair opportunities and support, recognising that fair does not always mean treating every child in exactly the same way.
- Children will be viewed as capable individuals whose interests, strengths, friendships, play choices, clothing, communication and aspirations are not limited by gender stereotypes.
- All children will have equitable access to spaces, equipment, experiences, leadership opportunities and educator attention.
- Educators will critically reflect on conscious and unconscious gender bias in language, expectations, behaviour guidance, programming and interactions.
- Children will be supported to question stereotypes and unfairness in developmentally appropriate ways.
- Family and cultural perspectives will be respected while maintaining children's rights, dignity, safety and applicable anti-discrimination obligations.

CHILDREN'S SAFETY, RIGHTS AND BEST INTERESTS

Paramountcy is relevant where gender-related decisions or conduct affect a child's safety, dignity, identity, participation or wellbeing. In those circumstances, the child's safety, rights and best interests will be the paramount consideration. Children's views will be heard and taken seriously, and adult preference, convenience or stereotypes will not override a child's safety or dignity.

EQUITABLE PROGRAMMING AND PLAY

- Programming will reflect My Time, Our Place V2.0 and its principles of equity, inclusion and high expectations and respect for diversity.
- Activities will not be labelled, promoted or restricted as being for boys or for girls. Children may choose from the full range of play and leisure experiences.
- Educators will not assume interests or abilities based on gender, for example expecting boys to prefer sport or construction or girls to prefer craft, caring or domestic play.

- Children will be encouraged, but not forced, to explore a broad range of experiences. Their genuine preferences will be respected.
- Leadership, helping roles, technology, sport, creative experiences, cooking, dramatic play and active play will be available equitably.
- Competition, teams and groupings will be organised in ways that avoid unnecessary gender division and promote inclusion.

LANGUAGE, INTERACTIONS AND EXPECTATIONS

- Educators will use respectful and inclusive language and avoid comments that reinforce stereotypes about how boys or girls should look, behave, play, feel or communicate.
- Expectations for behaviour, independence, emotional expression, physical activity, risk-taking, helping and leadership will not differ solely because of gender.
- Educators will avoid gender-based teasing, comparisons, assumptions about relationships or comments about children's bodies or appearance.
- Children will not be pressured into affection, physical contact, particular friendships or gendered roles.
- Educators will intervene when children or adults use sexist, degrading, exclusionary or gender-based language or behaviour and will explain why it is unfair or harmful in an age-appropriate way.

RESOURCES, DISPLAYS AND ENVIRONMENT

- Resources, books, images, displays and media will reflect people of different genders participating in diverse family, community, sporting, creative, caring, leadership and employment roles.
- Resources will be reviewed for stereotypes and used thoughtfully; stereotypical content may also provide an opportunity for critical discussion with school-age children.
- Diverse family structures will be represented respectfully, including single-parent, blended, kinship, foster, same-sex-parent and other families.
- The physical environment will allow children to access materials and play areas without gender-based barriers or assumptions.

GENDER DIVERSITY AND CHILD-SAFE PRACTICE

- Children will be treated with dignity and respect regardless of gender, gender expression or gender identity.
- Educators will respond to a child's expressed identity or preferred way of being respectfully and sensitively, considering the child's age, circumstances, privacy, safety and best interests.
- Gender-diverse children will not be singled out, questioned publicly, required to explain themselves to peers or have private information unnecessarily disclosed.
- Bullying, harassment, exclusion or intimidation based on gender, gender expression or perceived identity will be addressed promptly under the service's behaviour, child-safe and complaints procedures.
- Where individual support or sensitive family communication is required, the service will focus on the child's wellbeing, dignity and safety and seek appropriate guidance where necessary.

FAMILIES AND COMMUNITY

- Families will be welcomed and treated equitably regardless of family structure or gender roles.
- Families may contribute ideas, cultural perspectives and feedback to the program and service practices.

- Communication will avoid assumptions about who performs particular parenting, employment or caring roles within a family.
- Where family views differ from a child's expressed needs or from service obligations, educators will communicate respectfully while prioritising applicable law and the child's safety, rights and best interests.

STAFF PRACTICE, RECRUITMENT AND REFLECTION

- Staff recruitment and employment decisions will be based on role requirements, merit, suitability and applicable employment and anti-discrimination law, not a target or quota for male or female educators.
- The service values workforce diversity and positive role models of different genders without assuming that an educator should perform particular duties because of gender.
- Educators will reflect on who receives attention, praise, correction, leadership opportunities and access to particular experiences and adjust practice where patterns of bias are identified.
- Professional learning may be provided where reflection, complaints, observations or service review identify gender bias or discriminatory practice.

RESPONDING TO DISCRIMINATION, BIAS OR HARASSMENT

- Educators will respond promptly to gender-based teasing, stereotyping, harassment, exclusion or discriminatory behaviour rather than dismissing it as harmless joking.
- The child affected will be supported and their views heard. The response will avoid shaming children while clearly addressing harmful behaviour.
- Repeated or serious concerns will be documented, discussed with relevant families as appropriate, and managed through behaviour-support, complaints, child protection or reportable-conduct processes where applicable.
- Concerns involving an adult's conduct toward a child will be escalated in accordance with Cubby OOSH child protection, interactions and complaints procedures.

CONTINUOUS IMPROVEMENT

- The service will periodically review programs, resources, displays, policies, family feedback and educator practice for gender bias or barriers to equitable participation.
- Children's feedback will inform review of whether they experience the service as fair, inclusive and safe.
- Critical reflection will consider how stereotypes, social expectations, media and peer culture may influence children's experiences.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including current paramount consideration requirements where decisions affect children.
- Education and Care Services National Regulations, including regulations 155 and 156 relating to interactions with children and relationships in groups, and regulation 168 as applicable.
- National Quality Standard: QA1 Educational Program and Practice; QA4 Staffing Arrangements; QA5 Relationships with Children; QA6 Collaborative Partnerships; and QA7 Governance and Leadership.
- My Time, Our Place: Framework for School Age Care in Australia V2.0, including Equity, inclusion and high expectations and Respect for diversity.

- Children's Guardian Act 2019 (NSW) and Child Safe Standard 4 – Equity is upheld and diverse needs are taken into account.
- Sex Discrimination Act 1984 (Cth) and Anti-Discrimination Act 1977 (NSW), as applicable.
- Fair Work Act 2009 (Cth) and Workplace Gender Equality Act 2012 (Cth), where relevant to employment obligations.

SOURCES

- ACECQA – Guide to the National Quality Framework, current 2026 edition.
- ACECQA – My Time, Our Place V2.0: Equity, inclusion and high expectations; Respect for diversity; and Cultural responsiveness resources.
- NSW Office of the Children's Guardian – Child Safe Standards, particularly Standard 4.
- Australian Human Rights Commission – sex and gender discrimination guidance.
- Cubby OOSH Philosophy and related inclusion, interactions and anti-bias policies.

5.06 Show & Tell Policy

INTRODUCTION

In school-age care, children and young people benefit from opportunities to share their interests, experiences, ideas, culture, achievements and important parts of their lives with others. Show and Tell may be one way children choose to do this, but it is not a compulsory group activity. Cubby OOSH recognises that school-age care is a play- and leisure-based setting and that children should have genuine choice in how, when and whether they participate.

PURPOSE

To provide flexible and inclusive opportunities for children to share interests and experiences in ways that support confidence, communication, identity, belonging, relationships and child-led programming, while protecting each child's privacy, dignity, safety and right to choose.

SCOPE

This policy applies to Show and Tell and similar sharing experiences across before-school care, after-school care and vacation care, including spontaneous group discussions, sharing circles, child-led presentations, displays and digital sharing undertaken as part of the service program.

PLAY, LEISURE AND CHILD-LED PRACTICE

- Show and Tell may occur spontaneously or as an optional planned experience when it reflects children's interests and the service context.
- Children will not be required to participate, speak in front of a group, bring an item from home or disclose personal information.
- A child may choose to share verbally, show an object or creation, use a photo where permitted, demonstrate a skill, tell a story, draw, write, use communication supports or simply listen.
- Children's ideas and interests that emerge through sharing may inform future programming, projects, resources or leisure experiences.
- Educators will avoid turning Show and Tell into a formal classroom-style assessment or compulsory public-speaking exercise.

CHILD VOICE, AGENCY AND DIGNITY

- Children decide whether they wish to share and, where appropriate, what they wish to share.
- Educators will respect a child's decision to stop, pass, change their mind or ask for support.
- Children will not be pressured to discuss family circumstances, culture, disability, health, holidays, possessions, achievements or other personal matters.
- Educators will respond respectfully to what children share and will not ridicule, correct, compare or rank children's experiences or possessions.
- Children will be supported to ask respectful questions and listen to different viewpoints and experiences.
- Alternative participation methods will be available for children who are shy, anxious, neurodivergent, use alternative communication, speak languages other than English or simply prefer not to address a group.

INCLUSION AND EQUITY

- Sharing experiences will not depend on children bringing purchased items, expensive possessions, holiday souvenirs or other material objects.

- Educators will be mindful that family circumstances differ and will avoid practices that may create embarrassment, competition or socioeconomic comparison.
- Children may share everyday experiences, ideas, jokes, artwork, collections, nature discoveries, cultural knowledge, hobbies, achievements or things they have created at the service.
- Children's home languages, cultural knowledge and different communication styles will be welcomed and respected.
- Educators will challenge discriminatory, stereotypical or disrespectful comments and guide discussion in a way that maintains the dignity of all children and families.

ITEMS BROUGHT FROM HOME

- Children are not required to bring an item from home in order to participate.
- Where personal items are brought to the service, families and children should understand that the service cannot guarantee against accidental loss or damage unless otherwise required by law.
- Items must be suitable for the service environment and must not create an unreasonable safety risk.
- Weapons, weapon-like items, prohibited substances, unsafe chemicals, medications not managed under service procedures, explicit material or other inappropriate items must not be brought for Show and Tell.
- Food items will only be shared or consumed where this is consistent with the service's food, allergy, medical condition and hygiene procedures.
- Animals or living creatures will only be included where this has been appropriately planned and risk managed under the service's Animal Policy and relevant health and safety procedures.
- Natural items such as seed pods, plants, shells or found objects will be checked for foreseeable hazards such as sharp edges, allergens, toxic plants, insects, contamination or choking risks before group handling.

PRIVACY, PHOTOS AND DIGITAL CONTENT

- Children will not be expected to share photographs, videos, names, addresses, school details, family circumstances or other personal information.
- Photos or digital content used for a sharing experience must be handled in accordance with Cubby OOSH privacy, image/video and digital technology requirements.
- Educators will consider whether an image contains other children or people whose privacy or consent may be affected before it is displayed or shared.
- Children will be reminded not to photograph, record or post another child's sharing without appropriate permission.
- Personal devices will only be used in accordance with current service policy and National Law requirements.

EDUCATOR PRACTICE

Educators will:

- Create a relaxed and respectful atmosphere where children feel comfortable sharing or choosing not to share.
- Use open-ended questions when welcomed by the child rather than interrogating or placing the child under pressure.

- Support turn-taking and respectful listening without expecting children to remain in a formal group for longer than is reasonable.
- Follow children's interests and use spontaneous conversations as valid opportunities for connection and program development.
- Support peers to respond positively and intervene where teasing, ridicule, exclusion or inappropriate questioning occurs.
- Consider individual communication, sensory, cultural and support needs when facilitating group sharing.
- Critically reflect on whether Show and Tell remains meaningful for the children attending rather than continuing it simply because it has traditionally been part of the program.

SAFETY, RIGHTS AND BEST INTERESTS

Because Show and Tell may involve personal information, peer interactions and items brought into the service, educators will consider children's safety, rights and best interests when decisions under this policy directly affect a child. This does not require a separate formal paramountcy assessment for routine sharing; it means educators will intervene where participation, questioning, an item or peer response may compromise a child's safety, privacy, dignity or wellbeing.

FAMILY AND COMMUNITY CONNECTIONS

- Families may share information about children's interests, experiences, culture or significant events where the child is comfortable with this being incorporated into the program.
- Families will not be expected to purchase or prepare special items for Show and Tell.
- Community visitors or family participation may be incorporated where appropriate, child-safe, inclusive and consistent with service visitor and supervision procedures.
- Educators will respect that some family or cultural information is private and should not be used in the program without appropriate permission.

PROGRAMMING AND REFLECTION

- Children's sharing may contribute to observations, program ideas and critical reflection where this is meaningful and consistent with the service's educational program requirements.
- Educators will focus on children's interests, strengths, relationships, participation and wellbeing rather than documenting every Show and Tell experience.
- Where a child's interest leads to further experiences, educators may extend it through resources, projects, excursions, creative experiences, games, research or community connections.
- The service will periodically review whether sharing opportunities are accessible, inclusive, enjoyable and genuinely child-led.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including current child-safety and paramount consideration requirements where applicable.
- Education and Care Services National Regulations, including regulation 73 - educational program; regulation 155 - interactions with children; and regulation 156 - relationships in groups.
- National Quality Standard - Quality Area 1 Educational Program and Practice, particularly child-centred programming and responsive teaching; Quality Area 5 Relationships with Children, including dignity,

rights and respectful relationships; and Quality Area 6 Collaborative Partnerships with Families and Communities.

- My Time, Our Place: Framework for School Age Care in Australia V2.0.
- Applicable Cubby OOSH privacy, digital technology, child-safe environment, inclusion and supervision policies.

SOURCES

- ACECQA - Guide to the National Quality Framework, current 2026 edition.
- ACECQA - My Time, Our Place: Framework for School Age Care in Australia V2.0.
- ACECQA - MTOP Practice: Collaboration with children and young people.
- ACECQA - MTOP Practice: Play, leisure and intentionality.
- ACECQA - Quality Area 5: Relationships with children.
- United Nations Convention on the Rights of the Child, including children's rights to express views and to rest, leisure and play.

5.07 Guns & Superhero Play Policy

INTRODUCTION

Children and young people may explore superheroes, conflict, rescue, fantasy battles, weapons and themes of good and bad through imaginative play. These themes can arise from stories, games, films, media, community events, history, current events or children's own ideas. Cubby OOSH recognises imaginative and dramatic play as a legitimatae part of school-age leisure while also maintaining clear boundaries so that play remains consensual, inclusive and emotionally and physically safe.

PURPOSE

To support child-led superhero, fantasy and weapon-themed imaginative play in a balanced way that respects children's agency and creativity while preventing intimidation, injury, inappropriate conduct and distress. The service will guide the way play occurs rather than automatically treating a fantasy theme as unacceptable.

SCOPE

This policy applies to superhero, fantasy battle, rescue, spy, military, weapon-themed and similar dramatic play occurring during before-school care, after-school care, vacation care, excursions and other Cubby OOSH experiences. It applies to children's spontaneous play, costumes, props, drawings, construction and role-play.

GUIDING PRINCIPLES

- Children have a right to play, leisure, imagination, creativity and self-expression.
- A fantasy theme is not, by itself, evidence that a child is aggressive or violent.
- Educators will focus on how children are interacting, whether everyone involved is consenting and enjoying the play, and whether there is a foreseeable risk of harm.
- Play must respect the dignity, boundaries, culture, experiences and feelings of other children.
- Educators will avoid shaming children for an interest in superheroes, battles or fantasy weapons and will instead establish clear safety and relationship boundaries.
- Children who do not want to participate have the right to say no, leave the play or ask an educator for support.

SAFE AND RESPECTFUL PLAY

- Children will be supported to negotiate roles, rules and boundaries before and during energetic fantasy play.
- No child may be deliberately frightened, threatened, targeted, chased or surrounded after they have indicated they do not want to participate.
- Children must stop an action when another child says 'stop', withdraws consent, appears distressed or an educator identifies a safety concern.
- Pretend shooting, fighting or capture must not be directed at children, educators, families or visitors who are not willingly participating.
- Physical contact must remain within agreed safe boundaries. Real hitting, kicking, punching, choking, restraining, tackling or other harmful physical contact is not permitted.

- Educators may redirect the location, number of participants, props, noise level or style of play where this is necessary for safety or to protect other children's access to the environment.
- Children will be encouraged to include cooperation, rescue, problem-solving, teamwork, humour and imaginative story development rather than focusing only on defeating or harming others.

TOY WEAPONS, PROPS AND CONSTRUCTED ITEMS

- Cubby OOSH does not provide realistic replica firearms or realistic weapon replicas as routine play equipment.
- Families are asked not to send realistic toy guns or realistic weapon replicas to the service.
- Children may create clearly imaginative props from open-ended materials where educators assess that the play can occur safely.
- Everyday objects or constructions used as pretend weapons remain subject to the same safety boundaries as any other play equipment.
- Props must not be used to strike, poke, trip, restrain or deliberately frighten another person.
- Items that could reasonably be mistaken for a real weapon, create a serious safety concern, or are prohibited by law are not permitted at the service.
- If an unsafe or unsuitable item is brought to the service, educators will secure it away from children and contact the family or relevant authority as appropriate.

SUPERHERO AND FANTASY PLAY

- Children may engage with fictional heroes, villains, rescue characters and fantasy worlds in age-appropriate ways.
- Educators will help children distinguish fantasy from real-world harm when this becomes relevant to the play or discussion.
- Educators may extend children's interests through costumes, construction, art, comics, storytelling, obstacle courses, rescue challenges, dramatic play and collaborative games.
- Children will not be required to play a particular gendered role or be excluded from a role because of gender, ability, culture or other personal characteristics.
- Commercial characters may inspire children's play, but programming will also encourage children to create their own characters, stories, powers, rules and worlds.

WHEN EDUCATORS WILL INTERVENE

Educators will intervene when play:

- creates an immediate or foreseeable risk of physical injury;
- continues after a child withdraws consent or asks for it to stop;
- involves bullying, intimidation, coercion, harassment, discrimination or deliberate humiliation;
- becomes persistently focused on targeting or excluding a particular child;
- includes threats that appear credible or extend beyond imaginative play;
- causes significant distress to a child or other person;
- uses objects in an unsafe manner; or
- cannot be adequately supervised in the location or circumstances.

Intervention will be calm and proportionate. Where possible, educators will modify or redirect unsafe aspects of the play rather than automatically ending the entire play theme.

DISTINGUISHING FANTASY PLAY FROM A SAFETY OR WELLBEING CONCERN

- Educators will consider context, frequency, intensity, the child's emotional state, whether the play is reciprocal, whether children can stop or change the story, and whether the behaviour continues outside the agreed play.
- A single fantasy statement or pretend action will not automatically be treated as a threat.
- Repeated, specific or credible threats, disclosures, concerning knowledge, fixation linked with distress, or behaviour suggesting a child or another person may be at risk will be escalated to the Nominated Supervisor.
- Child protection, reportable conduct, emergency or Police procedures will be followed where the circumstances meet the relevant threshold.
- Educators will record objective observations rather than labelling a child as violent, dangerous or aggressive based solely on fantasy play.

MEDIA, DIGITAL GAMES AND CURRENT EVENTS

- Educators recognise that children's play may reflect films, television, online games, social media, news or conversations they have encountered.
- Where children raise real-world violence, war or distressing events, educators will respond calmly, avoid graphic detail and provide age-appropriate reassurance without dismissing children's questions.
- Digital content used at the service will comply with Cubby OOSH screen, media and online-safety requirements.
- Educators will be alert to content or conversations that may be distressing for children with personal or family experiences of violence, conflict, displacement or trauma and will adapt the environment sensitively.

INCLUSION, CULTURE AND INDIVIDUAL NEEDS

- Children's responses to weapon or battle play may differ because of culture, disability, neurodivergence, sensory needs, trauma, family experiences, beliefs or personal preference.
- No child will be required to participate in, watch or remain close to play that causes them distress.
- Reasonable adjustments may include changing the location, noise level, props, group size, rules or type of dramatic play.
- Educators will address racist, sexist, ableist, homophobic, transphobic or other discriminatory themes or language if they arise during fantasy play.
- Religious, cultural or family perspectives may be discussed respectfully, but family preferences will not override another child's safety, dignity or rights.

CHILDREN'S SAFETY, RIGHTS AND BEST INTERESTS

Where decisions about fantasy or weapon-themed play directly affect a child's safety, dignity, participation or wellbeing, educators will ensure the child's safety, rights and best interests are the paramount consideration. This includes considering the rights and safety of children who wish to participate as well as children who do not. Adult discomfort with a play theme alone is not a reason to override children's agency where the play remains safe and respectful.

FAMILY COMMUNICATION

- Educators may discuss recurring or concerning play with families where this will help understand context, support the child or manage a safety concern.
- Communication will be factual and non-judgemental and will distinguish imaginative play from actual harmful behaviour.
- Information about other children involved will remain confidential.
- Families may share relevant concerns or preferences, which will be considered alongside children's rights, service responsibilities and the needs of the group.

EDUCATOR RESPONSIBILITIES

- Actively supervise energetic or complex dramatic play and position themselves so they can respond promptly.
- Model calm, respectful conflict resolution and consent-based interactions.
- Support children to negotiate rules and repair relationships following conflict.
- Avoid introducing fear-based messages or graphic descriptions about real weapons or violence.
- Reflect on personal beliefs and bias so that adult views about superheroes, gender, weapons or media do not result in unnecessary restriction of safe child-led play.
- Document and escalate genuine safety, wellbeing or child-protection concerns in accordance with Cubby OOSH procedures.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including current paramount consideration requirements, section 166 - inappropriate discipline, section 166A - inappropriate conduct, and section 167 - protection from harm and hazards.
- Education and Care Services National Regulations, including regulation 73 - educational program, regulation 155 - interactions with children, and regulation 156 - relationships in groups.
- National Quality Standard - Quality Area 1 Educational Program and Practice, Quality Area 2 Children's Health and Safety and Quality Area 5 Relationships with Children.
- My Time, Our Place: Framework for School Age Care in Australia V2.0, including play, leisure, agency, collaboration and responsiveness to children.
- Applicable Cubby OOSH Child Safe Environment, Guiding Children's Behaviour, Interactions & Relationships with Children, Anti-Bias/Inclusion, Supervision and Digital Technology policies.

SOURCES

- ACECQA - Guide to the National Quality Framework, current 2026 edition.
- ACECQA - My Time, Our Place: Framework for School Age Care in Australia V2.0.
- ACECQA - Quality Area 1: Educational program and practice.
- ACECQA - Quality Area 5: Relationships with children.
- ACECQA - Information Sheet: Understanding paramount consideration.
- United Nations Convention on the Rights of the Child, including children's rights to express views and to rest, leisure and play.



Quality Area 6

6.01 Partnerships with Families Policy

INTRODUCTION

Collaborative partnerships with families are fundamental to quality outcomes for children and young people in outside school hours care. Families bring unique knowledge of their child, including their strengths, interests, culture, values, routines, communication, wellbeing and support needs. Cubby OOSH will build respectful, trusting and inclusive partnerships through genuine two-way communication, shared decision-making and opportunities for families to contribute to the service.

PURPOSE

To ensure families are welcomed, respected, informed and supported to participate in decisions about their child and the service. Partnerships will recognise family expertise while maintaining each child's voice, rights, safety, dignity, privacy and increasing independence as a school-age child or young person.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisors, Responsible Persons, Educational Leaders, educators, staff, students and volunteers across before-school care, after-school care and vacation care. It covers enrolment and orientation, everyday communication, educational programming, wellbeing and support planning, transitions, complaints and feedback, policy consultation and community connections.

GUIDING PRINCIPLES

- Families are children's first and most enduring influence and hold valuable knowledge about their child.
- Partnerships are built through mutual respect, trust, honesty, confidentiality, active listening and responsive communication.
- Families will be supported from enrolment to be involved in the service and to contribute to service decisions.
- The expertise, culture, values, beliefs and family circumstances of each family will be respected without discrimination or assumptions.
- Children and young people are active participants in decisions affecting them. As children grow, educators will balance family partnership with the child's views, privacy, autonomy and developing independence.
- Families will be offered genuine opportunities to participate, but involvement in events, committees, volunteering or program contributions is optional and will not affect the quality of care provided to their child.
- Communication and participation methods will be flexible and accessible for families with different languages, abilities, literacy, work commitments, family structures and access to technology.

ENROLMENT AND ORIENTATION

- Families will receive clear information about the service's philosophy, routines, fees, bookings, communication methods, policies, complaints process, educational program and key contacts.
- Orientation will provide opportunities for families and children to share information, ask questions, visit the service where appropriate and discuss what may support a positive transition.

- Educators will seek information relevant to the child's wellbeing, strengths, interests, friendships, culture, communication, medical needs, disability or additional needs and any authorised collection or court-order arrangements.
- Information will be collected respectfully and only where relevant to providing education and care or meeting legal obligations.
- Families will be encouraged to update enrolment, medical, contact, authorised nominee and other important information whenever circumstances change.
- Where a family requires communication support, the service will use reasonable accessible methods, which may include translated information, interpreters or alternative formats where available and appropriate.

EVERYDAY COMMUNICATION WITH FAMILIES

- Educators will greet families respectfully and provide meaningful opportunities to exchange relevant information at arrival and collection without compromising supervision.
- Important or sensitive conversations will be moved to a more private setting or arranged for another suitable time where possible.
- Communication may occur through approved service platforms, telephone, email, meetings, newsletters, notices and face-to-face conversations.
- Educators will communicate factually and professionally and will avoid discussing another child, family or staff member's confidential information.
- Families will be informed about significant matters affecting their child in accordance with service procedures and legal notification requirements.
- The service will consider families' preferred communication methods where practicable, while retaining appropriate records of significant information and decisions.

FAMILY EXPERTISE AND SHARED DECISION-MAKING

- Educators will seek and value family knowledge when planning for a child's participation, wellbeing, inclusion, transitions and support needs.
- Families will be invited to contribute ideas about children's interests, culture, community connections, celebrations, routines and experiences where relevant.
- Family views will be considered alongside the child's own views, educator professional judgement, service capacity and legal responsibilities.
- Where educators and families hold different views, discussions will remain respectful and focus on the child's needs, rights, safety and wellbeing.
- A family request will not be implemented where it would breach law, discriminate against another person, compromise adequate supervision or safety, or unreasonably infringe a child's rights or dignity.
- Significant decisions affecting a child's access, participation or support will be communicated clearly and, where appropriate, documented.

CHILDREN'S VOICE, PRIVACY AND INCREASING INDEPENDENCE

- School-age children and young people will be supported to express views about their experiences, relationships, program, support needs and matters affecting them.
- Educators will not assume that every detail a child shares must automatically be relayed to their family. Privacy will be respected subject to child-safety, wellbeing, legal and duty-of-care responsibilities.

- Where information must be shared for safety or wellbeing reasons, educators will explain this to the child in an age-appropriate way where safe and appropriate.
- Children will not be used as messengers in adult disputes or placed in the middle of disagreements between family members and the service.
- Family partnerships will support, rather than unnecessarily restrict, children's developing autonomy, choice and independence in the OOSH environment.

FAMILY PARTICIPATION IN THE SERVICE

- Families may be invited to contribute to projects, events, celebrations, policy reviews, quality improvement, community connections and aspects of the educational program.
- Families may share skills, interests, occupations, culture, language, stories or community knowledge when they wish to do so.
- Family participation involving direct access to children will comply with child-safe, supervision, visitor, privacy and Working with Children Check requirements as applicable.
- Family participation will be planned so that children's privacy, safety and usual access to the program are maintained.
- The service will not rely on family volunteers as a substitute for required staffing or adequate supervision.

ACCESS TO THE SERVICE

A parent may enter the service premises while their child is being educated and cared for, subject to the circumstances permitted by Regulation 157. Access may be restricted where entry would pose a safety risk, conflict with a duty under the National Law, or reasonably appear to contravene a court order. Access arrangements will also reflect school-site security, visitor and child-safe procedures.

PROGRAM AND DOCUMENTATION

- Families will be provided with information about the educational program and their child's participation in ways appropriate to school-age care and the service's documentation practices.
- Program information will recognise that OOSH is a play- and leisure-based setting and that children have choice, agency and varying levels of participation.
- Family contributions may inform programming, but educators will also draw directly on children's ideas, interests, strengths and feedback.
- Documentation shared with families will protect the privacy of other children and families and comply with Cubby OOSH privacy and digital technology requirements.

INCLUSION, EQUITY AND CULTURAL RESPONSIVENESS

- The service will work to remove barriers that may prevent families from participating or communicating with the service.
- Educators will use inclusive language and respect diverse cultures, languages, Aboriginal and Torres Strait Islander families, disability and neurodiversity, religions, family structures, gender identities and socioeconomic circumstances.
- Families will not be expected to educate the service about their culture, disability or identity; educators have a professional responsibility to seek reliable information and engage respectfully.
- Where specialist services, schools, inclusion professionals or other agencies are involved, information will only be shared with appropriate authority or consent unless disclosure is otherwise required or permitted by law.

TRANSITIONS AND PARTNERSHIPS WITH SCHOOLS AND OTHER SERVICES

- Cubby OOSH will collaborate with families, schools and relevant professionals to support continuity and transitions where appropriate.
- Roles and responsibilities will be clarified for school-to-OOSH handovers, safe arrival, inclusion supports, medical needs and other arrangements requiring coordinated action.
- Information sharing will be purposeful, limited to what is relevant and undertaken in accordance with privacy, consent, child-protection and legal requirements.
- Families will be involved in transition planning where appropriate, with the child's views also considered.

FEEDBACK, COMPLAINTS AND QUALITY IMPROVEMENT

- Families will be informed about how to provide feedback, raise a concern or make a complaint without fear of adverse treatment.
- Feedback may be sought through conversations, surveys, policy consultation, quality improvement processes, meetings or approved digital methods.
- Complaints will be managed respectfully, confidentially and in accordance with Cubby OOSH complaints and grievance procedures.
- Family feedback will be considered as part of critical reflection and continuous improvement. Where suggestions cannot be implemented, the service should provide a reasonable explanation where appropriate.
- Families may also be provided with information about external regulatory or support bodies when relevant.

INFORMATION AND COMMUNITY SUPPORT

- Current information about the service will be accessible to families through appropriate service communication channels.
- Where appropriate, families may be connected with relevant community services, inclusion supports, health or wellbeing resources, school contacts and other local supports.
- Educators will not diagnose, provide professional advice outside their role or pressure families to access a particular service.
- Community information will be current, relevant and shared in a respectful manner that supports family choice.

SAFETY, RIGHTS AND BEST INTERESTS

Partnership with families is important, but where a decision or request directly affects a child, Cubby OOSH will ensure the child's safety, rights and best interests are the paramount consideration. This is particularly relevant to significant decisions about safety, access, inclusion, behaviour support, privacy, medical needs, child protection, collection arrangements and participation. Children's views will be considered in accordance with their age, maturity, communication and circumstances.

RESPONSIBILITIES

The Approved Provider/Nominated Supervisor will:

- maintain systems that support enrolment, orientation, family communication, feedback, complaints and access to current service information;

- ensure educators understand confidentiality, respectful communication, child-safe practice and the requirements of Regulation 157;
- provide accessible opportunities for families to contribute to policy review and quality improvement;
- support appropriate referrals and partnerships with schools, community organisations and other professionals; and
- respond to significant family concerns and conflicts in a timely, fair and child-centred manner.

Educators will:

- build respectful and professional relationships with families while maintaining appropriate boundaries;
- listen to family knowledge and communicate relevant information about children's experiences and wellbeing;
- seek children's views and protect their dignity and privacy;
- document and escalate significant information, concerns or changes in accordance with service procedures; and
- reflect on bias, assumptions and communication practices that may create barriers for families.

Families are encouraged to:

- provide accurate and current enrolment, contact, medical, authorised collection and other relevant information;
- share information that may help the service support their child's wellbeing, inclusion and participation;
- communicate respectfully with educators and raise concerns through the service's feedback or complaints processes;
- follow service access, collection, visitor, privacy and child-safety procedures; and
- contribute to the service in ways that are comfortable and practical for their family.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including current paramount consideration and child-safety requirements where relevant.
- Education and Care Services National Regulations, including Regulation 73 - educational program; Regulation 76 - information about educational program to be given to parents; Regulation 157 - access for parents; and Regulation 168 - required policies and procedures.
- National Quality Standard - Quality Area 6: Standard 6.1 Supportive relationships with families and Standard 6.2 Collaborative partnerships, including Elements 6.1.1, 6.1.2, 6.1.3, 6.2.1, 6.2.2 and 6.2.3.
- My Time, Our Place: Framework for School Age Care in Australia V2.0 - Partnerships, collaboration with children and young people, continuity and transitions, cultural responsiveness, equity and inclusion.
- Privacy Act 1988 (Cth) and applicable Australian Privacy Principles where applicable to the service.
- Children's Guardian Act 2019 (NSW) and Child Safe Standards where relevant to family participation, visitors and child-safe practice.

SOURCES

- ACECQA - Guide to the National Quality Framework, 2026.
- ACECQA - Quality Area 6: Collaborative partnerships with families and communities.
- ACECQA - QA6 Information Sheet: Building partnerships with families.
- ACECQA - QA6 Information Sheet: Enrolment and orientation.

- ACECQA - My Time, Our Place: Framework for School Age Care in Australia V2.0.
- ACECQA - MTOP Principle: Partnerships.
- Cubby OOSH Philosophy and related service policies and procedures.

6.02 Developing Partnerships with Cultural and Linguistically Diverse Families

INTRODUCTION

Cubby OOSH recognises that culturally and linguistically diverse families bring valuable languages, identities, knowledge, beliefs, customs, family structures and community connections to the service. Culturally responsive practice goes beyond celebrating festivals or displaying multicultural resources. It requires educators to listen, build genuine relationships, respect multiple ways of knowing, doing and being, remove barriers to participation and respond to unfairness, racism, bias and discrimination.

PURPOSE

To build respectful, equitable and culturally safe partnerships with culturally and linguistically diverse children, young people and families so they can access information, participate in decisions, maintain their language and cultural identity, and experience a genuine sense of belonging within Cubby OOSH.

SCOPE

- This policy applies to the Approved Provider, Nominated Supervisors, Responsible Persons, Educational Leaders, educators, staff, students and volunteers across before-school care, after-school care and vacation care.
- It applies to enrolment and orientation, everyday communication, educational programming, family participation, complaints and feedback, inclusion planning, transitions and community partnerships.
- Aboriginal and Torres Strait Islander cultural safety and partnerships are also supported through Cubby OOSH policies specifically addressing First Nations perspectives and reconciliation.

GUIDING PRINCIPLES

- Families are experts in their own culture, language, values and circumstances and will be approached with curiosity and respect rather than assumptions.
- Cultural responsiveness includes respecting multiple cultural ways of knowing, doing and being and taking action when unfairness or discrimination occurs.
- Culture is individual and dynamic. Children and families who share a cultural or language background may have different identities, beliefs, practices and preferences.
- Families will not be expected to represent, explain or teach an entire culture or language group.
- Participation in cultural sharing is voluntary. Families and children may choose what they wish to share and what they wish to keep private.
- Children and young people will be supported to maintain pride in their identity, home language, family and community connections while also developing respectful understanding of others.

ENROLMENT AND ORIENTATION

- Families will be asked about preferred names, pronunciation, languages used at home, preferred communication methods and any cultural or religious practices relevant to their child’s care and participation.
- Orientation will be flexible and may include additional time, visual information, translated material, interpreter support or assistance from an appropriate support person where reasonably available.

- Important service information will be explained in a way the family can understand. Educators will check understanding rather than assuming written English information is sufficient.
- Children and families will be welcomed without requiring them to change or minimise their language, accent, culture, dress, food practices or identity unless a specific safety or legal requirement applies.

COMMUNICATION AND LANGUAGE ACCESS

- Cubby OOSH will use plain, respectful language and offer information in accessible formats where practicable.
- Where important information cannot be understood adequately in English, the service will consider appropriate interpreting or translation options rather than relying only on children to interpret for adults.
- Children should not be placed in the position of interpreting sensitive, medical, behavioural, complaint, child-protection or other significant adult information.
- Families may nominate an appropriate support person to assist with communication, subject to privacy and consent requirements.
- Educators will make reasonable efforts to learn and correctly pronounce children's and family members' names and may learn simple greetings or words in home languages where welcomed by the family.
- Home languages are viewed as strengths. Children may communicate and interact in their home language, and educators will support multilingual expression rather than requiring English-only participation.

CULTURALLY RESPONSIVE PROGRAMMING - MTOP V2.0

- Children's cultures, languages, families and communities will be reflected naturally across the program throughout the year, not only during festivals or special cultural days.
- Programs may include books, music, art, games, stories, food experiences, community knowledge, languages and everyday experiences from diverse cultures when these are accurate, respectful and relevant.
- Educators will avoid tokenism, stereotypes, cultural costumes or activities that trivialise sacred, ceremonial or significant cultural practices.
- Children and families may contribute ideas and resources, but participation or disclosure will never be compulsory.
- Educators will critically review resources, media and displays for stereotypes, inaccurate representation or a single-story view of a culture.
- Children's questions about language, culture, race, migration, religion and difference will be answered respectfully and in age-appropriate ways.

FAMILY PARTNERSHIPS AND SHARED DECISION-MAKING

- Families will have meaningful opportunities to contribute to decisions about their child's learning, wellbeing, inclusion and participation.
- Cultural and religious preferences will be discussed respectfully and incorporated where practicable and consistent with children's safety, rights, inclusion and service obligations.
- Families may be invited to share skills, stories, language, traditions, community contacts or experiences, but the service will not pressure families to provide cultural labour or disclose personal histories.

- Where family preferences and service requirements differ, educators will explain the relevant safety, legal or operational requirements and work collaboratively to identify respectful alternatives.
- Family feedback will inform critical reflection, policy review and quality improvement.

EQUITY, INCLUSION AND CHILD SAFE PRACTICE

- Cultural and language differences will not be treated as deficits or mistaken for lack of ability, lack of engagement or behavioural difficulty.
- Educators will consider whether language barriers, unfamiliar routines, migration experiences, cultural expectations or communication differences are affecting a child's participation before making assumptions about behaviour.
- All children and families will have equitable access to information, support and complaints processes.
- Racist comments, slurs, stereotyping, exclusion or discrimination by children or adults will be addressed promptly and in accordance with Cubby OOSH anti-bias, behaviour guidance, complaints and child-safe procedures.
- Incidents will be responded to without shaming children, while clearly communicating that racism and discriminatory behaviour are not acceptable.
- Repeated or serious concerns will be documented and escalated so appropriate support and risk management can occur.

CHILDREN'S VOICE, IDENTITY AND PRIVACY

- Children and young people will be invited to express how they want their culture, language, name, identity and family experiences represented at the service.
- A child will not be required to discuss migration, refugee experiences, religion, family history or cultural identity with the group.
- Personal information about visa status, migration history, family circumstances, religion or language support needs will be treated confidentially and shared only where authorised, necessary or legally required.
- Children will be supported to choose whether to participate in cultural experiences where participation is not necessary for safety or service operations.

SAFETY, RIGHTS AND BEST INTERESTS

Where a cultural, language or family decision directly affects a child's safety, dignity, rights, inclusion or wellbeing, the child's safety, rights and best interests will be the paramount consideration. Educators will consider the child's own views as well as family perspectives and will seek respectful solutions wherever possible. Cultural or religious practice will not be used to justify discrimination, degrading treatment, unsafe practice or the denial of a child's rights.

COMMUNITY CONNECTIONS

- The service may build relationships with local multicultural organisations, language services, schools, community groups and relevant support agencies to strengthen inclusion and family access.
- Community partnerships will be selected carefully and will respect privacy, child-safe requirements and the diversity within cultural communities.
- Where families are seeking support, educators may provide current information about relevant community services without diagnosing, making assumptions or pressuring a family to engage with a particular service.

EDUCATOR RESPONSIBILITIES AND REFLECTIVE PRACTICE

- Use respectful, inclusive and non-stereotyping language in all interactions and documentation.
- Reflect on personal assumptions, unconscious bias, privilege and how service routines may unintentionally create barriers for culturally and linguistically diverse families.
- Seek reliable professional learning rather than relying on individual families to provide all cultural education.
- Challenge racism, prejudice and discriminatory practice when observed.
- Consult families and children about what culturally safe and welcoming practice looks like for them.
- Ensure translated or interpreted information remains accurate, confidential and appropriate to the significance of the communication.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including the guiding principles of equity, inclusion and diversity, respect for the role of parents and families, and current paramount consideration requirements where relevant.
- Education and Care Services National Regulations, including Regulation 73 - educational program, Regulation 76 - information about the educational program to be given to parents, Regulation 155 - interactions with children, Regulation 156 - relationships in groups, and Regulation 168 - required policies and procedures.
- National Quality Standard - Quality Area 1, Quality Area 5 and Quality Area 6, particularly Elements 6.1.1, 6.1.2, 6.1.3, 6.2.2 and 6.2.3.
- My Time, Our Place: Framework for School Age Care in Australia V2.0 - Partnerships, Cultural Responsiveness, Equity, Inclusion and High Expectations, and Collaboration with Children and Young People.
- NSW Child Safe Standards, particularly Standard 3 - families and communities are informed and involved, and Standard 4 - equity is upheld and diverse needs are taken into account.
- Racial Discrimination Act 1975 (Cth), Disability Discrimination Act 1992 (Cth), Sex Discrimination Act 1984 (Cth) and Anti-Discrimination Act 1977 (NSW), as applicable.

SOURCES

- ACECQA - Guide to the National Quality Framework, current 2026 edition.
- ACECQA - Quality Area 6: Collaborative partnerships with families and communities.
- ACECQA - My Time, Our Place: Framework for School Age Care in Australia V2.0.
- ACECQA - Information Sheet: MTOP Practices - Cultural responsiveness.
- ACECQA - Information Sheet: MTOP Principles - Partnerships.
- NSW Office of the Children's Guardian - Child Safe Standards, Standards 3 and 4.
- Australian Human Rights Commission - racial discrimination and anti-discrimination guidance.
- Cubby OOSH Philosophy and related inclusion, anti-bias and partnerships policies.

6.03 Aboriginal & Torres Strait Islander Awareness Policy

INTRODUCTION

Cubby OOSH recognises Aboriginal and Torres Strait Islander peoples as the First Peoples of Australia and acknowledges the diversity, strength and continuing cultures, knowledges, languages, histories and connections to Country, Place, family and community of Aboriginal and Torres Strait Islander peoples. In school-age care, embedding Aboriginal and Torres Strait Islander perspectives is an ongoing responsibility for all services, whether or not Aboriginal and Torres Strait Islander children and families are currently enrolled.

The service acknowledges the continuing impacts of colonisation, dispossession, racism and the forced removal of children and recognises that culturally safe, truthful and respectful practice is essential to children's identity, belonging, wellbeing and participation.

PURPOSE

To embed respectful, accurate and locally informed Aboriginal and Torres Strait Islander perspectives throughout Cubby OOSH practice, programming and community partnerships; strengthen reconciliation; support cultural safety for Aboriginal and Torres Strait Islander children and families; and provide all children with meaningful opportunities to learn about and value the world's oldest continuing cultures.

SCOPE

- Applies to the Approved Provider, Nominated Supervisors, Responsible Persons, Educational Leaders, educators, staff, students and volunteers across before-school care, after-school care and vacation care.
- Covers the educational program, environments, resources, family and community partnerships, significant dates, Acknowledgement of Country, Reconciliation Action Plan actions and educator professional learning.
- Practice will recognise that Aboriginal and Torres Strait Islander peoples, communities, languages and cultural protocols are diverse; there is no single Aboriginal or Torres Strait Islander culture or one-size-fits-all approach.

GUIDING PRINCIPLES

- Aboriginal and Torres Strait Islander perspectives are embedded throughout the year and are not limited to special events or significant dates.
- Local knowledge and relationships matter. Educators will seek appropriate guidance about the Traditional Custodians, Country, language and community relevant to each service location rather than relying on generic assumptions.
- Aboriginal and Torres Strait Islander children and families will experience culturally safe, respectful and inclusive environments that affirm identity and belonging.
- Children will encounter truthful, age-appropriate perspectives that recognise living cultures, contemporary Aboriginal and Torres Strait Islander peoples and histories as well as traditional knowledges.
- Educators will actively avoid tokenism, stereotypes, cultural appropriation and inaccurate representations.

- Children and families are invited, but never expected, to act as cultural representatives or to educate the service about Aboriginal and Torres Strait Islander cultures.

RECONCILIATION ACTION PLAN (RAP)

- Cubby OOSH will use its Reconciliation Action Plan as an active framework for meaningful reconciliation actions, reflection and continuous improvement.
- RAP actions will be relevant to the service context and may address relationships, respect and opportunities across the program, service environment and community.
- Educators, children, families and community members may contribute to RAP development and review where appropriate.
- RAP commitments will be reflected in everyday practice rather than treated as a stand-alone document or once-a-year activity.
- Where appropriate, services may use Reconciliation Australia's Narragunnawali: Reconciliation in Education resources to support RAP development and professional learning.

ACKNOWLEDGEMENT OF COUNTRY AND WELCOME TO COUNTRY

- Cubby OOSH may include an Acknowledgement of Country at appropriate service events, meetings, gatherings and program experiences. The wording should be respectful, meaningful and relevant to the local Country where known.
- Children may be involved in developing or sharing an Acknowledgement of Country where participation is voluntary and supported by genuine learning about its meaning.
- A Welcome to Country is a cultural protocol delivered by Traditional Owners or Aboriginal and Torres Strait Islander people who have appropriate authority to welcome visitors to their Country. Cubby OOSH educators and children will not describe an educator-led acknowledgement as a Welcome to Country.
- Displays and written acknowledgements will be reviewed for accuracy and will not substitute for ongoing culturally responsive practice and relationships.

PROGRAMMING AND EVERYDAY PRACTICE

- Aboriginal and Torres Strait Islander perspectives will be embedded across play, leisure, projects, art, music, storytelling, books, games, nature experiences, sustainability, local history, language learning where appropriate and conversations arising from children's interests.
- Programming will reflect My Time, Our Place V2.0 and its principle of Aboriginal and Torres Strait Islander perspectives, including children's connection to community, Country and Place.
- Experiences will be meaningful and age-appropriate for school-age children and young people rather than classroom-style, compulsory or tokenistic activities.
- Educators will support children to ask respectful questions, think critically about stereotypes and understand that Aboriginal and Torres Strait Islander cultures are diverse, contemporary and continuing.
- Where cultural stories, symbols, artworks, language, music, dance, ceremonies or knowledge are used, educators will consider cultural ownership, permissions, authenticity and local protocols.
- Sacred, ceremonial or culturally restricted material will not be copied, recreated or used as a generic craft activity without appropriate authority and understanding.

RESOURCES, ARTWORK AND CULTURAL MATERIALS

- Resources will be selected for authenticity, accuracy, respectful representation and relevance to children's age and service context.

- Where possible, the service will source books, artwork, music, games and learning resources created by Aboriginal and Torres Strait Islander authors, artists, organisations and communities.
- Educators will avoid generic “Aboriginal-style” templates, copying artworks or symbols without understanding, and activities that reduce culture to dots, flags, boomerangs or isolated craft experiences.
- Resources will include contemporary Aboriginal and Torres Strait Islander people and achievements as well as history and traditional knowledge.
- Where images, stories or recordings of deceased Aboriginal and Torres Strait Islander people may be included, educators will consider appropriate cultural warnings and community guidance.

SIGNIFICANT DATES AND EVENTS

- NAIDOC Week, National Reconciliation Week, National Sorry Day and National Aboriginal and Torres Strait Islander Children’s Day may provide opportunities for deeper learning, reflection and community connection.
- Significant dates will complement, not replace, year-round embedding of Aboriginal and Torres Strait Islander perspectives.
- Experiences will be planned with attention to the purpose and history of the occasion and will avoid celebration or activities that are inaccurate, superficial or disrespectful.

PARTNERSHIPS WITH ABORIGINAL AND TORRES STRAIT ISLANDER FAMILIES AND COMMUNITIES

- Services will seek genuine, sustainable relationships with local Aboriginal and Torres Strait Islander families, Elders, community members and organisations where appropriate.
- Local councils, schools and reputable Aboriginal organisations may help identify appropriate community contacts, but educators will not assume a council can speak on behalf of Traditional Owners or determine cultural authority.
- Invitations to Elders, community members, artists or cultural educators will be respectful, planned in consultation and recognise cultural expertise, including appropriate payment or agreed arrangements where applicable.
- Families may share culture, language, stories or community knowledge if they choose, but participation is voluntary and no family will be pressured to disclose cultural information or represent a whole community.
- Community advice will be listened to and incorporated into service practice where appropriate, including corrections where the service has used inaccurate or culturally unsafe material.

CULTURAL SAFETY, IDENTITY AND BELONGING

- Aboriginal and Torres Strait Islander children will be supported to maintain and strengthen cultural identity, connection, confidence and belonging.
- Educators will pronounce names respectfully, avoid assumptions about identity or appearance, and recognise that identity is personal and should not be questioned or challenged by staff or peers.
- Racism, racial slurs, stereotyping, discriminatory jokes and exclusion will be addressed promptly in accordance with Cubby OOSH anti-bias, behaviour guidance and child-safe procedures.
- Children will not be singled out, asked to explain culture to peers or publicly identified as Aboriginal or Torres Strait Islander without appropriate context and respect for privacy.
- Where a child or family identifies culturally specific communication, kinship, family or community considerations, educators will work respectfully with the family while maintaining the child’s rights and service responsibilities.

CHILDREN'S VOICE AND AGENCY

- Children and young people will have opportunities to contribute ideas, questions and perspectives to reconciliation and cultural learning.
- Participation in cultural experiences will be respectful and voluntary; children will not be forced to perform, speak, create artwork or participate in an activity that causes discomfort.
- Educators will listen to children's questions and misconceptions without shaming them and will guide discussion toward accurate, respectful understanding.
- Children's ideas may inform RAP actions, environmental displays, local community projects and future programming.

SAFETY, RIGHTS AND BEST INTERESTS

Where cultural practice, community participation, programming or a decision under this policy directly affects a child, the child's safety, rights and best interests will be the paramount consideration. This includes protecting children from racism, humiliation, cultural harm, unsafe participation or inappropriate disclosure of identity while also respecting their views, culture, family and community connections.

EDUCATOR RESPONSIBILITIES AND PROFESSIONAL LEARNING

- Educators will build their own knowledge rather than relying on Aboriginal and Torres Strait Islander children or families to provide cultural education.
- Professional learning will support understanding of local Country, histories, contemporary cultures, reconciliation, cultural responsiveness, anti-racism, bias and culturally safe practice.
- Educators will critically reflect on whose perspectives are represented in the program and environment and identify stereotypes, omissions or assumptions that require change.
- Errors will be acknowledged and corrected respectfully. Educators will seek reliable sources and community guidance where they are unsure about cultural content or protocols.
- Recruitment and employment will be inclusive and merit-based. Cubby OOSH values Aboriginal and Torres Strait Islander educators and staff and will maintain culturally safe employment practices without using identity as a tokenistic staffing strategy.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including the guiding principles of equity, inclusion and diversity; valuing Australia's Aboriginal and Torres Strait Islander cultures; and current paramount consideration requirements where relevant.
- Education and Care Services National Regulations, including Regulation 73 - Educational program; Regulation 76 - Information about educational program to be given to parents; Regulation 155 - Interactions with children; and Regulation 156 - Relationships in groups.
- National Quality Standard - Quality Area 1 Educational Program and Practice; Quality Area 5 Relationships with Children; and Quality Area 6 Collaborative Partnerships with Families and Communities, particularly community engagement and inclusive participation.
- My Time, Our Place: Framework for School Age Care in Australia V2.0 - Aboriginal and Torres Strait Islander perspectives, cultural responsiveness, respect for diversity, partnerships, equity and inclusion.

- Children's Guardian Act 2019 (NSW) and NSW Child Safe Standards, including culturally safe and equitable practice where relevant.
- Racial Discrimination Act 1975 (Cth) and Anti-Discrimination Act 1977 (NSW).

SOURCES

- ACECQA - Guide to the National Quality Framework, 2026.
- ACECQA - My Time, Our Place: Framework for School Age Care in Australia V2.0.
- ACECQA - MTOP Principle: Aboriginal and Torres Strait Islander perspectives.
- ACECQA - MTOP Practice: Cultural responsiveness.
- ACECQA - Quality Area 6: Collaborative partnerships with families and communities.
- Reconciliation Australia - Narragunnawali: Reconciliation in Education and Reconciliation Action Plan resources.
- Reconciliation Australia - Welcome to and Acknowledgement of Country guidance.
- Cubby OOSH Reconciliation Action Plan, Acknowledgment to Country, Philosophy and related service policies.

6.04 Open Door Policy

INTRODUCTION

Cubby OOSH values open, respectful and collaborative relationships with families and the community. Families are welcome to engage with the service, communicate with educators and contribute to service decisions and children's experiences. An open-door approach operates alongside the service's legal duties to maintain adequate supervision, secure premises, privacy, child-safe practices, court orders and the safety, rights and wellbeing of every child.

PURPOSE

To provide families with genuine access, participation and communication opportunities while clearly setting out the safety, security, visitor and privacy requirements that apply when adults enter or participate in the service.

SCOPE

This policy applies to parents, guardians and people with parental responsibility, family members, community visitors, prospective families, volunteers, contractors and other adults attending Cubby OOSH during before-school care, after-school care, vacation care, excursions or service events.

OPEN AND WELCOMING FAMILY PARTNERSHIPS

- Families will be welcomed respectfully and supported from enrolment to be involved in the service and contribute to service decisions.
- Families may contact the service, speak with educators, provide feedback and share information about their child's interests, wellbeing, culture, routines, support needs and experiences.
- Families may be invited to contribute skills, knowledge, culture, community connections or ideas to the program where they wish to do so.
- Family participation is voluntary and a family's ability to attend the service or participate in events will not affect the quality of education and care provided to their child.
- Sensitive or detailed discussions will be arranged at a suitable time or in a more private setting where necessary so that supervision and confidentiality are not compromised.
- Families will be informed about how to provide feedback or make a complaint and will not be treated adversely for raising a concern.

PARENT ACCESS – REGULATION 157

A parent of a child may enter the service premises at any time the child is being educated and cared for by the service, subject to Regulation 157 of the Education and Care Services National Regulations.

The Approved Provider, Nominated Supervisor or Responsible Person may refuse or restrict entry where:

- permitting entry would pose a risk to the safety of children or staff;
- permitting entry would conflict with a duty under the Education and Care Services National Law; or
- there is a reasonable belief that permitting entry would contravene a court order.

Any decision to refuse or restrict a parent's access will be based on the circumstances at the time, documented where appropriate and escalated to management. Where the circumstances also trigger a notification requirement, the service will notify the Regulatory Authority within the required timeframe.

ARRIVAL, COLLECTION AND TEMPORARY DEPARTURE

- Children may only leave the service in accordance with authorised collection arrangements and applicable National Regulations and service procedures.
- Where an authorised person collects a child and the child later returns to care, the child's departure and return must be accurately recorded through the service's attendance system.
- Families must follow service and school-site entry, gate, sign-in/sign-out and security procedures.
- A family's right of access does not permit an unauthorised person to collect a child or override a court order, parenting order or other lawful restriction.
- Educators will maintain accurate attendance and ensure children are accounted for during arrivals, departures and transitions.

VISITORS, FAMILY PARTICIPATION AND COMMUNITY MEMBERS

- Adults who are not attending solely as a parent exercising access to their own child will follow the service's visitor procedures.
- Visitors must identify themselves, state the purpose of their visit and complete the service's visitor record where required.
- The Nominated Supervisor or Responsible Person will ensure visitor arrival and departure information is recorded and available for emergency accounting.
- Visitors will be informed of relevant child-safe, emergency, privacy, supervision and site requirements.
- Visitors must remain within approved areas and must not be left alone with children unless they are authorised, appropriately screened and their role permits this.
- Family or community participation in activities will be planned so that adequate supervision, children's privacy and normal program access are maintained.
- Visitors must report hazards, injuries, incidents or near misses to an educator or Responsible Person promptly.

CONTRACTORS AND SERVICE PROVIDERS

- Contractors will report to the Responsible Person and follow site access, visitor, safety and child-safe requirements.
- Work areas, tools, chemicals, equipment and other hazards will be controlled so children cannot access them.
- Contractors must not be left alone with children unless their role, screening, authorisation and service arrangements lawfully permit this.
- Where practical, higher-risk maintenance or contractor work will be scheduled away from children or managed through additional controls.

SECURITY OF THE SERVICE

- The open-door philosophy does not mean external doors or gates are to remain physically open or unsecured.
- External access points will be managed in accordance with the service's Security, Child Safe Environment, Safe Arrival, Emergency and school-site procedures.
- Adults must not allow unknown or unauthorised people to enter through secured gates or doors behind them.

- Children will not open external gates or doors for visitors unless this forms part of a specifically supervised and risk-managed procedure.
- Where a visitor's behaviour creates an immediate safety risk, educators will follow emergency, lockdown and Police procedures as appropriate.

COURT ORDERS AND RESTRICTED ACCESS

- Current court orders, parenting orders and other lawful restrictions held by the service will be followed.
- Families are responsible for providing the service with current copies of relevant orders and notifying the service of changes.
- The open-door approach does not override a court order or a legal duty to protect children or staff.
- Where a person attempts to enter or collect a child contrary to a known order or creates an immediate threat, educators will prioritise safety, secure children as required and contact Police on 000 where necessary.

PRIVACY, PHOTOGRAPHY AND DIGITAL DEVICES

- Visitors and families must respect the privacy of all children, families and staff while on service premises.
- Visitors must not photograph, video or audio-record children other than their own child unless expressly authorised under Cubby OOSH procedures and all required permissions are in place.
- Photography or recording must never interfere with supervision, child safety or a child's dignity and right to privacy.
- Service staff will comply with current National Law requirements and Cubby OOSH policies governing personal devices, service-supplied devices, images and digital technologies.
- Confidential information, enrolment records, medical information and staff records must not be viewed or accessed by visitors.

HEALTH, SAFETY AND APPROPRIATE CONDUCT

- Visitors and families must follow reasonable health and safety directions given by educators or the Responsible Person.
- Smoking, vaping, alcohol, illicit drugs and other prohibited substances are not permitted within the education and care service environment in accordance with law and service policy.
- Hot drinks and other burn hazards must be kept away from children and managed in accordance with the service's risk controls.
- Visitors must follow allergy-aware and food-safety directions where food is brought into or consumed at the service.
- Harassment, threats, intimidation, discrimination, abusive language, violence or inappropriate conduct towards children, families, educators or other visitors will not be accepted.
- A person may be directed to leave where their conduct creates a safety risk, breaches a lawful service requirement or is inconsistent with child-safe practice.

CHILD SAFE PRACTICE AND FAMILY INVOLVEMENT

- Cubby OOSH will communicate openly with families about its child-safety approach and provide accessible information about relevant policies and reporting pathways.
- Families and communities will have opportunities to contribute feedback about child-safe practices, service policies and environments.
- Family participation will never replace educator supervision or staffing responsibilities.

- Children will be supported to express whether they are comfortable with visitors, family participation and activities involving them, subject to lawful care and safety requirements.
- Educators will be alert to situations where adult access, familiarity or participation could create boundary, privacy or grooming risks and will apply appropriate safeguards.

SAFETY, RIGHTS AND BEST INTERESTS

Where access, visitor or family-participation decisions directly affect a child, the child's safety, rights and best interests will be the paramount consideration. This includes balancing meaningful family involvement with the safety and rights of the child concerned and other children attending the service. A family preference or an 'open door' expectation cannot override a court order, child-protection responsibility, lawful safety requirement or another child's privacy.

RESPONSIBILITIES

The Approved Provider/Nominated Supervisor will:

- maintain clear access, visitor, security, emergency and child-safe procedures;
- ensure educators understand Regulation 157 and the circumstances in which parent access may lawfully be restricted;
- ensure significant access restrictions, incidents or concerns are documented and reported where required;
- provide families with accessible information about participation, complaints, privacy and child-safe expectations; and
- review visitor and access arrangements where incidents, site changes or identified risks indicate controls need improvement.

Educators/Responsible Persons will:

- welcome families while maintaining active supervision and secure access;
- verify visitors and follow visitor-record procedures;
- protect children's privacy and confidential information;
- respond promptly to unsafe or inappropriate visitor behaviour; and
- escalate court-order, access, child-protection or safety concerns to management and emergency services where required.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including current child-safety and paramount consideration requirements where applicable.
- Education and Care Services National Regulations, including Regulation 157 - access for parents; Regulation 160 - child enrolment records including court orders/parenting arrangements; Regulation 168 - required policies and procedures; and Regulation 175 - prescribed notifications.
- National Quality Standard - Quality Area 2 Children's Health and Safety, Quality Area 3 Physical Environment, Quality Area 6 Collaborative Partnerships with Families and Communities, and Quality Area 7 Governance and Leadership.
- NSW Child Safe Standards, particularly Standard 3 - Families and communities are informed and involved, Standard 8 - Physical and online environments minimise opportunities for abuse, and Standard 10 - Policies and procedures document how the organisation is child safe.

- My Time, Our Place: Framework for School Age Care in Australia V2.0 - partnerships, collaboration, inclusion and children's agency.
- Applicable Cubby OOSH Child Protection, Emergency/Lockdown, Child Safe Environment, Security, Safe Arrival, Privacy/Digital Technology, Delivery and Collection, and Partnerships with Families policies.

SOURCES

- ACECQA - Guide to the National Quality Framework, current 2026 edition.
- ACECQA - Quality Area 6: Collaborative partnerships with families and communities.
- ACECQA - My Time, Our Place: Framework for School Age Care in Australia V2.0.
- NSW Office of the Children's Guardian - Child Safe Standards and guidance.
- Cubby OOSH Philosophy and related policies and procedures.

6.05 Informing Families of Our Policies

INTRODUCTION

Clear, accessible policies and procedures help families understand how Cubby OOSH operates, what they can expect from the service and how decisions affecting children are made. Families are important partners in service governance and continuous improvement. Cubby OOSH will make relevant policies and procedures available, communicate significant changes accurately and invite meaningful family feedback while meeting the National Law, National Regulations and National Quality Standard.

PURPOSE

To ensure families can readily access current service policies and procedures, understand significant changes that may affect their child or their use of the service, and have genuine opportunities to provide feedback and contribute to policy review and service decision-making.

SCOPE

This policy applies to the Approved Provider, Nominated Supervisors, Responsible Persons, Educational Leaders, educators and staff responsible for developing, reviewing, approving, communicating or implementing Cubby OOSH policies and procedures across before-school care, after-school care and vacation care.

GUIDING PRINCIPLES

- Policies and procedures will reflect current legal requirements, recognised guidance, the service context and Cubby OOSH practice.
- Families will have reasonable and practical access to current policies and procedures and will be informed about how to locate them.
- Family expertise, feedback, culture, values and lived experience will be respected and considered during policy review where relevant.
- Children and young people may also contribute views to policies and procedures that affect their experiences, safety, rights, participation or wellbeing.
- Consultation does not remove the Approved Provider's responsibility to ensure policies comply with law and protect children.
- Policy information will be communicated in clear, respectful and accessible ways, with alternative formats or communication support considered where reasonably practicable.

ACCESS TO POLICIES AND PROCEDURES

- Policies and procedures required under the National Regulations will be available for inspection at the service in accordance with Regulation 171.
- Families will be informed during enrolment and orientation about where current policies and procedures can be accessed and how to request assistance locating or understanding them.
- Access may be provided through approved digital platforms, the service website or family portal, electronic copies, service devices, printed copies or another practical method used by Cubby OOSH.
- Families may request a copy of a policy or procedure or ask to discuss how it applies in practice.
- Current versions will be controlled so that families and educators are not unintentionally relying on superseded documents.

- Where a policy refers to a form, plan or related procedure needed by families, the service will make that supporting information reasonably accessible.

FAMILY CONSULTATION AND FEEDBACK

- Families will be provided with meaningful opportunities to comment on policies and procedures, particularly where a review concerns matters that affect children, families or the local service community.
- Feedback may be invited through the Policy Feedback Form, approved digital platforms, email, surveys, meetings, newsletters, conversations, consultation displays or other suitable methods.
- Families are not required to wait for a scheduled review and may provide policy feedback at any time.
- Feedback will be considered respectfully. Where a suggestion cannot be adopted because of legislation, child safety, privacy, operational requirements or the rights of others, this may be explained where appropriate.
- Consultation will aim to include families who may experience barriers to participation, including language, disability, literacy, work commitments, technology access or cultural barriers.
- Family feedback may inform the service Quality Improvement Plan, critical reflection and continuous improvement.

CHILDREN AND YOUNG PEOPLE IN POLICY REVIEW

- Where appropriate, educators will seek children's views about policies, routines and procedures that directly shape their OOSH experience.
- Consultation will be age-appropriate, voluntary and embedded in ordinary conversations, meetings, surveys, suggestion processes, program reflection or other child-friendly methods.
- Children will not be expected to interpret legislation or make decisions that are the legal responsibility of adults.
- Children will be told, in a way they can understand, when their feedback has influenced a change where appropriate.

POLICY REVIEW AND VERSION CONTROL

- Policies and procedures will be reviewed according to Cubby OOSH's review schedule and earlier where required by legislative or regulatory change, an incident, complaint, identified risk, audit, assessment and rating feedback, changes in service practice or evidence that a procedure is not working effectively.
- Reviews will consider applicable National Law and Regulations, current NSW requirements, National Quality Standard, My Time Our Place V2.0 where relevant, recognised authority guidance, service-specific risks and feedback from children, families and educators.
- Each policy will identify its development date, most recent review or revision date and next planned review date in accordance with Cubby OOSH document-control practices.
- Relevant source material and linked policies, procedures, forms or documents will be reviewed for currency and consistency.
- Superseded versions will be archived or managed in accordance with Cubby OOSH governance and record-management arrangements so the current approved version is identifiable.

NOTIFYING FAMILIES OF SIGNIFICANT CHANGES - REGULATION 172

The Approved Provider will notify parents of children enrolled at the service at least 14 days before making a change to a policy or procedure required under Regulation 168 or 169 where the change:

- may have a significant impact on the service's provision of education and care to a child enrolled at the service;
- may have a significant impact on a family's ability to use the service; or
- affects the fees charged or the way fees are collected.

The 14-day notice period is not required where the Approved Provider considers that waiting would pose a risk to the safety, health or wellbeing of a child. In that circumstance, families will be notified as soon as practicable after the change is made. Routine editorial corrections or changes that do not meet the Regulation 172 threshold do not automatically require 14 days notice, although Cubby OOSH may still communicate them where useful.

HOW CHANGES WILL BE COMMUNICATED

- Notices of significant change will identify the policy or procedure, explain the nature of the change, state when it takes effect and provide information about how families can access the updated document or seek clarification.
- Communication may occur by approved service app or platform, email, newsletter, notice, family memo, direct correspondence or another reliable method appropriate to the service and the significance of the change.
- Where a change affects a particular child or family in a specific way, direct communication may also occur in addition to general service notification.
- Communication records will be retained where necessary to demonstrate that required notice was provided.

POLICIES AFFECTING CHILD SAFETY, RIGHTS AND WELLBEING

This policy is primarily about family information and governance, so a separate paramountcy process is not required for every policy review or communication. However, where the content of a policy, a proposed change or a consultation decision concerns a particular child, the child's safety, rights and best interests must be the paramount consideration. Family or operational preferences cannot override legal child-safety duties or a child's safety, dignity and rights.

ACCESSIBILITY, PRIVACY AND CONFIDENTIALITY

- Policy information intended for families will use clear language where practicable and assistance will be offered where a family needs support to understand important requirements.
- Translated information, interpreting or alternative communication methods will be considered where reasonably practicable and necessary for meaningful access.
- Consultation records and feedback will be managed in accordance with privacy and confidentiality requirements.
- Individual children, families or staff will not be identifiable in general policy consultation material unless disclosure is authorised, necessary and lawful.

- Public or family-facing versions of documents will not contain confidential operational information where disclosure could compromise child safety, privacy or security.

RESPONSIBILITIES

The Approved Provider/Nominated Supervisor will:

- ensure required policies and procedures are in place, accessible and reviewed;
- ensure reasonable steps are taken so nominated supervisors, educators, staff and volunteers follow relevant policies and procedures as required by Regulation 170;
- ensure Regulation 172 notifications are issued when the legal threshold is met;
- maintain appropriate document control and evidence of significant policy communication;
- provide opportunities for family and, where relevant, child input; and
- ensure urgent changes required for child safety are implemented without being delayed solely to complete a consultation period.

Educators and staff will:

- know how families can access policies and direct them to the current version;
- communicate policy requirements consistently and avoid giving information that conflicts with approved policy;
- forward family feedback or concerns to the appropriate supervisor or manager;
- participate in policy review and professional discussion as required; and
- implement current approved policies and procedures in practice.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including current child-safety and paramount consideration requirements where relevant.
- Education and Care Services National Regulations: Regulation 168 - education and care service must have policies and procedures; Regulation 170 - policies and procedures to be followed; Regulation 171 - policies and procedures to be kept available; Regulation 172 - notification of change to policies or procedures; and Regulation 185 - law and regulations to be available.
- National Quality Standard - Quality Area 6, including Element 6.1.1 Engagement with the service and Element 6.1.2 Parent views are respected; and Quality Area 7 Governance and Leadership.
- My Time, Our Place: Framework for School Age Care in Australia V2.0, including partnerships, collaboration with children and young people, and critical reflection and ongoing professional learning.
- NSW Child Safe Standards where policies, family engagement and consultation concern child-safe practice.

SOURCES

- ACECQA - Guide to the National Quality Framework, current 2026 edition.
- ACECQA - Quality Area 6: Collaborative partnerships with families and communities.
- ACECQA - Quality Area 7: Governance and leadership.
- ACECQA - My Time, Our Place: Framework for School Age Care in Australia V2.0.
- NSW Early Learning Commission - Developing policies and procedures and current child-safety guidance.

- Cubby OOSH Philosophy and related governance, complaints, privacy and family partnership policies.

6.06 Complaints & Grievance Procedures for Families

INTRODUCTION

Feedback and complaints are an important part of a safe, accountable and continuously improving OOSH service. Cubby OOSH welcomes concerns, complaints and grievances from families and will respond respectfully, promptly, fairly and without victimisation. Complaints involving children will be managed through a child-focused process in which children's safety, rights, wellbeing, dignity and views are central.

PURPOSE

To provide a clear and accessible process for receiving, assessing, investigating, resolving, documenting, escalating and reviewing complaints and grievances from families, while meeting notification, child protection, reportable conduct, privacy and procedural fairness obligations.

SCOPE

This policy applies to complaints and grievances made by parents, carers, authorised nominees, family members and community members about Cubby OOSH services, educators, staff, volunteers, contractors, service practices or incidents. Employment and industrial grievances are managed under relevant workplace procedures, although child-safety concerns raised by any person must still be acted on under child-protection and regulatory requirements.

GUIDING PRINCIPLES

- Complaints will be taken seriously and assessed according to risk, not dismissed because they are verbal, informal, anonymous or difficult to substantiate at first contact.
- People may complain verbally or in writing and are not required to use a particular form before the service will respond.
- Families will be treated respectfully and will not be disadvantaged, intimidated or victimised for raising a concern in good faith.
- Procedural fairness will be applied where appropriate, including an opportunity for affected people to respond to allegations before findings are made, unless doing so would compromise child safety, a statutory investigation or evidence.
- Confidentiality will be maintained on a need-to-know basis, but cannot be promised where information must be reported or disclosed by law.
- Complaints will be used to identify patterns, systemic issues and opportunities for quality and child-safety improvement.

CHILD-FOCUSED COMPLAINT HANDLING

- Children and young people may raise concerns directly with educators or another trusted adult and will be supported to communicate in ways that suit their age, communication style, disability, language and circumstances.
- A child will not be required to repeat a disclosure unnecessarily or be questioned in a way that could compromise evidence or increase distress.
- Where a complaint concerns a child, the service will consider the child's immediate safety, privacy, support needs and views before focusing on reputational, operational or adult interests.

- Children will be told, in an age-appropriate way, what may happen next and when information cannot remain confidential because adults have a duty to act.
- No child will be blamed, punished, shamed or disadvantaged for making a complaint, disclosure or raising a concern.
- Where several children are involved, the rights, safety and support needs of all children will be considered without labelling or stigmatising any child.

DEFINITIONS

Complaint

An expression of dissatisfaction, concern or allegation about the service, a person associated with the service, a decision, practice, incident or failure to act. A complaint may be verbal, written, anonymous, informal or formal and may require immediate action depending on risk.

Grievance

A concern or complaint that remains unresolved, is more complex or serious, or requires formal review, investigation or mediation. Cubby OOSH will not delay safety or reporting action simply because a matter has not been labelled a grievance.

Notifiable complaint

A complaint that alleges a serious incident has occurred or is occurring at the service, or that the Education and Care Services National Law has been contravened. The Approved Provider must notify the NSW Early Learning Commission within 24 hours in accordance with section 174(2)(b) and regulation 176.

Serious incident

A serious incident has the meaning given by the National Regulations and includes prescribed circumstances such as the death of a child; specified serious injury, trauma or illness; a child appearing to be missing or unable to be accounted for; a child being taken or removed contrary to the Regulations; or a child being mistakenly locked in or out of the service.

HOW FAMILIES CAN MAKE A COMPLAINT

- Families may speak with an educator, Responsible Person, Nominated Supervisor, Area Manager or other identified complaints contact.
- Complaints may be made face-to-face, by telephone, email, approved service communication platform or in writing.
- Families may use the Complaints and Grievance Register/feedback process, but a form is not required for the complaint to be accepted.
- The name and telephone number of the person to whom complaints may be made will be clearly displayed at the service as required by Regulation 173.
- Families may have a support person or interpreter where appropriate.
- Accessible communication or interpreting support will be considered where language, disability, literacy or other barriers affect a person's ability to use the complaints process.
- A family may contact the NSW Early Learning Commission directly, particularly where there is concern about a child's health, safety or wellbeing or compliance with the National Law and Regulations.

INITIAL RESPONSE AND RISK ASSESSMENT

- The person receiving the complaint will listen, remain calm, clarify the concern without unnecessary questioning and record relevant facts.
- Immediate safety needs will be addressed before administrative complaint steps.
- The Nominated Supervisor/Responsible Person will be informed promptly of complaints involving child safety, serious incidents, alleged misconduct, inappropriate discipline/conduct, discrimination, privacy breaches, significant supervision concerns or possible breaches of law.
- Management will determine whether the matter requires regulatory notification, child-protection reporting, reportable conduct notification, Police involvement, workplace action or another external referral.
- Evidence such as records, rosters, attendance information, incident records, approved digital records or CCTV will be preserved where relevant and lawful.
- Where an allegation concerns an adult, risk controls may be implemented while enquiries occur. Interim controls are protective measures and do not themselves determine guilt.

REGULATORY NOTIFICATIONS

- The Approved Provider must notify the NSW Early Learning Commission within 24 hours of receiving a complaint alleging that a serious incident has occurred or is occurring at the service, or that the National Law has been contravened.
- Incidents or allegations of physical or sexual abuse of a child while the child is being educated and cared for by the service are subject to the current 24-hour notification requirements.
- Notifications for OOSH services are submitted through the National Quality Agenda IT System (NQA ITS) using the appropriate notification pathway.
- A notification is required where the statutory threshold is met even if the complainant does not want further action or later withdraws the complaint.
- Where staff are unsure whether a notification is required, the matter will be escalated promptly and current ACECQA/NSW Early Learning Commission guidance used. Uncertainty will not be used to delay a time-critical notification.

CHILD PROTECTION, REPORTABLE CONDUCT AND POLICE

- Complaints involving suspected risk of significant harm will be managed under Cubby OOSH Child Protection procedures and NSW mandatory reporting requirements, including use of the Mandatory Reporter Guide where appropriate.
- Where the threshold for a report to the Child Protection Helpline is met, the report will be made without delay.
- Allegations involving an employee, volunteer or other person covered by the NSW Reportable Conduct Scheme will be escalated to the Head of Relevant Entity or approved delegate so Office of the Children's Guardian obligations can be assessed and met.
- Police will be contacted where there is an immediate danger, suspected criminal conduct requiring urgent Police involvement, or where directed by relevant authorities.
- Internal complaint enquiries will not interfere with or compromise a child-protection, Police, regulatory or reportable conduct investigation.

COMPLAINTS INVOLVING HARMFUL SEXUAL BEHAVIOURS BETWEEN CHILDREN

- Concerns, disclosures or observations of harmful or concerning sexual behaviours between children will be responded to immediately and reported to the Nominated Supervisor.
- Educators will protect the immediate safety, privacy and dignity of all children and avoid blame, interrogation, public discussion or stigmatising language.
- The behaviour and surrounding circumstances will be assessed using child-protection procedures, the Mandatory Reporter Guide where appropriate, and advice from relevant authorities.
- Families will be informed in a sensitive and lawful manner, taking account of child-protection or Police advice and the privacy of other children.
- Individual risk-management, supervision, behaviour-support or safety plans will be developed where needed to support safe ongoing participation.
- A complaint about harmful sexual behaviour will also be assessed for NQF notification and other reporting obligations; it is not treated as a separate reporting category merely because the behaviour involves another child.

INVESTIGATION AND PROCEDURAL FAIRNESS

- The person investigating will be sufficiently impartial and must declare any actual, potential or perceived conflict of interest.
- Where the complaint concerns the Nominated Supervisor, Approved Provider or another decision-maker, an appropriate alternative investigator or senior manager will be appointed where practicable.
- Relevant records and information will be gathered proportionately and only from people whose involvement is necessary.
- People against whom allegations are made will ordinarily be told the substance of the allegation and given a reasonable opportunity to respond before findings are made, subject to child-safety and external-investigation requirements.
- A support person may attend meetings where appropriate. The role of the support person must not obstruct the process or compromise confidentiality.
- Findings will be based on relevant information and the applicable standard of proof for the type of internal process being undertaken.
- The service may pause, limit or sequence an internal investigation where an external authority advises that doing so is necessary.

TIMEFRAMES AND COMMUNICATION

- Complaints will be acknowledged as soon as practicable and urgent child-safety concerns will be acted on immediately.
- Cubby OOSH will aim to make initial contact with the complainant within 24 hours where practicable.
- Straightforward matters should be resolved promptly. More complex matters may require longer than seven working days because of evidence gathering, procedural fairness or external agency involvement.
- Where a final outcome cannot reasonably be provided within seven working days, the complainant will be given an update and advised of the next steps or expected review point where appropriate.
- The complainant will be informed of the outcome to the extent lawful and appropriate. Privacy, employment confidentiality, child-protection restrictions and the rights of other people may limit the detail that can be disclosed.

OUTCOMES AND CORRECTIVE ACTION

- Outcomes may include an explanation, apology, correction of records, policy or practice changes, staff guidance or training, increased supervision, risk controls, behaviour or inclusion supports, referral to another process, disciplinary action or other proportionate action.
- If a complaint is not substantiated, this does not prevent the service from identifying practice improvements or risk controls.
- Where a complaint identifies a breach or systemic issue, corrective action will be assigned, monitored and reviewed for effectiveness.
- No person will be victimised for making or participating in a complaint in good faith. Deliberately false or malicious conduct may be addressed separately, but a complaint that cannot be substantiated is not automatically a false complaint.

PRIVACY, CONFIDENTIALITY AND RECORDS

- Complaint information will be shared only with people who need it to respond, investigate, support a child, meet legal obligations or ensure procedural fairness.
- Records will be factual, objective, dated and securely stored in accordance with Cubby OOSH privacy and record-retention requirements.
- The Complaints and Grievance Register will record sufficient information to monitor the matter, outcome, actions, notifications and recurring themes.
- Complaint records involving children, staff or sensitive allegations will not be made generally accessible to educators or families.
- Information may be disclosed to the NSW Early Learning Commission, Office of the Children's Guardian, Department of Communities and Justice, Police or another lawful authority where required or authorised.

FAMILIES' RIGHTS AND EXTERNAL REVIEW

- Families may ask for a complaint to be reviewed by a more senior manager where appropriate.
- Families are not required to exhaust Cubby OOSH's internal process before contacting the NSW Early Learning Commission about regulatory or child-safety concerns.
- Families concerned about the health, safety or wellbeing of a child at an OOSH service may contact the NSW Early Learning Commission on its current published contact channels.
- Other matters may fall within the jurisdiction of bodies such as NSW Fair Trading, the NSW Ombudsman, the Australian Human Rights Commission or employment/industrial agencies, depending on the issue.

SAFETY, RIGHTS AND BEST INTERESTS

Where a complaint concerns or affects a child, the child's safety, rights and best interests are the paramount consideration. This means complaint handling, interim risk controls, communication, investigation and resolution must not prioritise the service's reputation, convenience, financial interests or an adult's preference over child safety and rights. The views of the child will be considered in a manner appropriate to their age, maturity, communication and circumstances.

RESPONSIBILITIES

Approved Provider / Nominated Supervisor

- ensure the complaints contact details required by Regulation 173 are displayed and the policy is accessible;
- ensure complaints are risk-assessed, documented, investigated or referred appropriately;

- make or escalate required NQF, child-protection and reportable conduct notifications within statutory timeframes;
- manage conflicts of interest and procedural fairness;
- protect complainants and participants from victimisation;
- monitor corrective actions and analyse complaint trends for continuous improvement; and
- ensure educators understand complaint pathways and child-focused responses.

Educators and staff

- listen respectfully and record concerns accurately;
- take immediate protective action where a child may be at risk;
- promptly inform the Responsible Person/Nominated Supervisor of significant complaints;
- avoid promising secrecy or conducting their own unauthorised investigation;
- maintain privacy and preserve relevant records; and
- cooperate with lawful internal and external investigations.

Families

- are encouraged to raise concerns as early as possible and provide relevant information where available;
- may use any accessible complaint pathway and may have a support person or interpreter where appropriate;
- are asked to communicate respectfully and protect the privacy of children and other families; and
- may contact an external authority at any time where they believe this is necessary.

EVALUATION AND CONTINUOUS IMPROVEMENT

- The Nominated Supervisor/Approved Provider will periodically review the Complaints and Grievance Register for patterns, repeated concerns, delays, child-safety themes and systemic issues.
- Complaint outcomes and feedback will inform the Quality Improvement Plan, risk assessments, policies, training, supervision and service practices where relevant.
- The effectiveness and accessibility of this complaints process will be reviewed with input from families, educators and, where appropriate, children and young people.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including section 174 notification requirements and current paramount consideration/child-safety duties where applicable.
- Education and Care Services National Regulations, including Regulation 168(2)(o) dealing with complaints; Regulation 170 policies and procedures to be followed; Regulation 173 prescribed information to be displayed; Regulation 176 notification timeframes; Regulation 183 storage of records; and relevant serious incident provisions.
- National Quality Standard - Quality Area 6 Collaborative Partnerships with Families and Communities and Quality Area 7 Governance and Leadership, including current child-safety focus.
- Children's Guardian Act 2019 (NSW) and NSW Reportable Conduct Scheme where applicable.

- Children and Young Persons (Care and Protection) Act 1998 (NSW) and mandatory reporting requirements.
- NSW Child Safe Standards, particularly Standard 6: processes to respond to complaints of child abuse are child focused, Standard 9 continuous review, and Standard 10 child-safe policies and procedures.
- Privacy Act 1988 (Cth) and applicable privacy obligations.

SOURCES

- ACECQA - Guide to the National Quality Framework, current 2026 edition.
- ACECQA - Dealing with Complaints Policy and Procedure Guidelines.
- ACECQA - Reporting requirements about children and current notification guidance.
- NSW Early Learning Commission - Notifications and Reporting; Feedback and Complaints; Reporting Incidents and Concerns.
- NSW Office of the Children's Guardian - Child Safe Standards and Reportable Conduct guidance.
- NSW Department of Communities and Justice - Mandatory Reporter Guide and Child Protection Helpline guidance.
- Cubby OOSH Philosophy and related Child Protection, Interactions, Behaviour Guidance, Privacy, Record Keeping and Governance policies.

6.07 Orientation of New Children & Families Policy

INTRODUCTION

Enrolment and orientation are important opportunities for Cubby OOSH to begin respectful, trusting partnerships with children and families. A flexible and individualised orientation helps children understand what to expect, develop a sense of belonging and become familiar with educators, routines, spaces, other children and the play and leisure opportunities available in school age care.

PURPOSE

Cubby OOSH aims to ensure every child and family receives clear, welcoming and accessible information before care commences and is supported through an orientation process that reflects the child's age, strengths, interests, culture, communication, wellbeing, previous experiences, additional needs and family circumstances.

SCOPE

This policy applies to new children and families enrolling in before school care, after school care and vacation care, including children transitioning into school, children transferring between Cubby OOSH services and, where applicable, preschool-age children attending an OOSH service in accordance with NSW requirements.

GUIDING PRINCIPLES

- Children and families are active participants in orientation and will be given meaningful opportunities to ask questions, share information and express preferences.
- Orientation will be flexible and individualised. A family will not be disadvantaged because work, transport, disability, language, family circumstances or other barriers prevent attendance at a lengthy or in-person orientation.
- Family knowledge about the child is valued and used alongside the child's own views to support wellbeing, inclusion, relationships and participation.
- Information will be provided in accessible ways and interpreting or communication support considered where needed.
- Orientation is an ongoing process rather than a single visit and may continue after the child's first attendance.

BEFORE THE CHILD COMMENCES

Once a place is accepted, Cubby OOSH will support the family to complete the enrolment process and provide current service information.

- Families will complete the approved enrolment process and provide the information, authorisations and health information required under Regulations 160-162.
- The service will obtain current contact details for parents, emergency contacts and authorised nominees, together with relevant collection, excursion and transport authorisations.
- Families will be asked to provide current court orders, parenting orders or parenting plans relevant to the child where applicable.
- Families will provide information about medical conditions, allergies, medications, dietary requirements, disability, additional needs and other health or safety considerations. Required medical management and risk-minimisation documentation must be in place before attendance where applicable.

- Families will be invited to share the child's home language, cultural background, family structure, religion or beliefs, interests, strengths, friendships, fears, communication preferences, sensory needs, behaviour-support strategies and other information that will help the child feel safe and included.
- For school-age children, Cubby OOSH will not make enrolment conditional on meeting preschool immunisation enrolment requirements that do not apply to children who have commenced formal schooling. Relevant immunisation information may still be collected or considered where lawfully required for health and outbreak management.
- Where a child is preschool age or under and attends an OOSH service, any additional NSW requirements applying to that child's age and circumstances will be checked before commencement.

INFORMATION PROVIDED TO FAMILIES

Families will be provided with, or shown how to access, current information about:

- the Cubby OOSH philosophy and the play and leisure-based nature of school age care;
- service hours, fees, bookings, cancellations and late collection arrangements;
- arrival, departure, authorised collection and attendance procedures;
- safe arrival arrangements between school and OOSH where relevant;
- the daily rhythm, available experiences, indoor/outdoor spaces and how children exercise choice and agency;
- food and nutrition arrangements and how dietary requirements are managed;
- medical conditions, medication, illness, exclusion and emergency procedures;
- behaviour guidance, interactions with children, inclusion and child-safe practices;
- emergency, evacuation and lockdown arrangements;
- family communication methods and how information about the child's experience can be shared;
- access to service policies, the complaints process and the person to whom complaints may be made;
- privacy, photography, digital technologies and the service's current image/device requirements;
- family participation and the service's Open Door Policy, subject to child safety, privacy, security and court orders; and
- relevant community, inclusion or family-support services where appropriate.

ORIENTATION VISITS AND FAMILIARISATION

- Families and children will be invited to visit and become familiar with the service before commencement where practical.
- The number, timing and length of orientation visits will be negotiated with the family and child rather than applying a compulsory one-size-fits-all requirement.
- The child will be shown important areas such as entry and collection points, toilets, eating areas, play spaces, quiet areas, storage for belongings and places they can seek help from educators.
- Children will be introduced to educators and, where appropriate, other children in ways that respect the child's comfort and preferences.
- Children may observe or participate in experiences during orientation if they choose and if enrolment, supervision, insurance and service requirements allow.
- Educators will explain routines and boundaries in a school-age appropriate way without requiring unnecessary compliance with routines that do not reflect the child's needs or the leisure-based nature of OOSH.

- Where a child cannot attend before their first booked session, educators will provide additional support and familiarisation on commencement.

CHILD VOICE, CHOICE AND AGENCY

- Educators will speak directly with the child as well as their family and invite the child to share what would help them feel comfortable.
- Children may identify preferred activities, people, spaces, routines or settling strategies and may choose whether to participate in optional orientation experiences.
- Children will be told who they can approach if they feel worried, unsafe, confused or need help.
- School-age children will be supported to develop increasing independence appropriate to their age and circumstances, while educators continue to meet supervision and duty-of-care responsibilities.
- Children will not be forced to separate from a family member in a particular way, make physical contact, speak publicly, join a group activity or disclose personal information merely as part of orientation.

INCLUSION, CULTURE AND ACCESSIBILITY

- Orientation will be culturally responsive and respectful of family structure, language, culture, religion, identity and child-rearing practices.
- Families from culturally and linguistically diverse backgrounds will be offered accessible information and communication support where needed.
- Aboriginal and Torres Strait Islander children and families will be welcomed in culturally safe ways that respect identity, Country, community connections and family knowledge.
- A diagnosis is not required before Cubby OOSH begins discussing reasonable adjustments or inclusion strategies with a family.
- Where additional support is required, the service may work collaboratively with the family, school, inclusion professionals or other authorised providers, with appropriate consent and information-sharing safeguards.
- Orientation and enrolment practices will not discriminate against a child or family on the basis of disability, race, culture, language, religion, sex, gender, family structure or other protected attributes.

MEDICAL CONDITIONS, ALLERGIES AND HEALTH NEEDS

- Before attendance, educators must have access to the information and plans required to safely manage a child's known medical condition, allergy or healthcare need.
- Relevant educators will be informed of the child's health needs and emergency response requirements while protecting confidentiality.
- Medication supplied to the service must comply with Cubby OOSH Medication and Medical Conditions policies.
- Orientation will include practical discussion with the family about risk-minimisation strategies, communication arrangements and the child's level of understanding and self-management where relevant.

COURT ORDERS, AUTHORISED COLLECTION AND PRIVACY

- Current court orders, parenting orders or parenting plans provided to the service will be recorded and followed.
- Families will be asked to keep authorised nominee and emergency contact information current.

- Only authorised persons may collect a child in accordance with the National Regulations and Cubby OOSH procedures.
- Personal, health, family and court-order information collected during enrolment and orientation will be handled confidentially and only shared where required for education and care, safety, legal compliance or with appropriate consent.

FIRST DAYS AND ONGOING SETTLING

- Educators will greet and acknowledge the child and family on arrival and provide extra support where needed.
- The child's settling will be monitored through observation, conversation with the child and communication with the family.
- Families will be informed about significant settling concerns and invited to work with educators on responsive strategies.
- Educators will avoid assuming distress requires the same response for every child. Strategies will be based on the individual child, family input and the child's views.
- Where concerns continue, the service will consider environmental changes, inclusion supports, adjustments, school collaboration or other appropriate supports before considering restrictions on participation.
- Orientation information will be updated when the child's circumstances, health, authorised contacts or support needs change.

TRANSITION BETWEEN SCHOOL AND OOSH

- Where a child moves between school and OOSH, orientation will explain the service's safe arrival, roll-marking, absence and handover procedures.
- Children new to Kindergarten or new to the school will receive additional support to understand where to go, who will meet them and what happens if arrangements change.
- Where appropriate and authorised, Cubby OOSH will work with the school and family to support continuity, inclusion and safe transitions.
- Information sharing with schools or external professionals will occur only where authorised or otherwise permitted or required by law.

SAFETY, RIGHTS AND BEST INTERESTS

Where an enrolment or orientation decision directly affects a child, the child's safety, rights and best interests will be the paramount consideration. The child's views will be considered in a manner appropriate to their age, maturity, communication and circumstances. Family preferences will be respected wherever possible but cannot override child-safety, legal, supervision, medical or court-order requirements.

RESPONSIBILITIES

Approved Provider / Nominated Supervisor

- ensure enrolment records contain the information and authorisations required by law before care is provided;
- ensure families receive current and accessible service information and know how to access policies and complaints processes;
- identify medical, child-protection, court-order, inclusion or safety matters requiring action before commencement;

- ensure educators receive the information they need to safely support the child while maintaining confidentiality;
- coordinate with schools and external professionals where appropriate and authorised; and
- review the orientation process using feedback from children, families and educators.

Educators

- welcome and engage directly with each child and family;
- learn about the child's strengths, interests, communication and support needs;
- provide predictable information and practical familiarisation without unnecessarily restricting child choice;
- monitor settling and communicate respectfully with families;
- implement relevant medical, inclusion, behaviour-support and safety arrangements; and
- raise gaps or concerns in enrolment information promptly with the Nominated Supervisor/Responsible Person.

Families

- provide accurate and current enrolment, contact, authorisation, health and court-order information;
- inform the service promptly when relevant information changes;
- share information that will assist educators to understand and support their child; and
- ask questions, provide feedback and participate in orientation in ways that suit their family's circumstances.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including current child-safety and paramount consideration requirements where relevant.
- Education and Care Services National Regulations, including Regulations 99, 102AAB-102AAC where applicable to safe arrival, 157, 158 (NSW), 160, 161, 162 (including NSW-specific health-plan requirements), 168, 177, 181 and 183.
- National Quality Standard - Standard 5.1 Relationships between educators and children; Standard 6.1 Supportive relationships with families, particularly Elements 6.1.1-6.1.3; Standard 6.2 Collaborative partnerships; and Standard 7.1 Governance.
- My Time, Our Place: Framework for School Age Care in Australia V2.0 - partnerships, respect for diversity, equity/inclusion, secure relationships and children's agency.
- Disability Discrimination Act 1992 (Cth) and applicable anti-discrimination obligations.
- NSW child-safe requirements and Child Safe Standards where relevant to enrolment, family engagement, inclusion, privacy and child safety.

SOURCES

- ACECQA - Guide to the National Quality Framework, current 2026 edition.
- ACECQA - QA6 Enrolment and Orientation information sheet, current 2026 resource.
- ACECQA - QA7 Development of Child Enrolment Record.
- ACECQA - My Time, Our Place: Framework for School Age Care in Australia V2.0.

- NSW Early Learning Commission - current NSW-specific NQF requirements and OOSH guidance.
- Cubby OOSH Philosophy and related Enrolment, Medical Conditions, Safe Arrival, Open Door, Inclusion, Privacy and Child Protection policies.

For further information about ongoing transitions, refer to 6.08 Transitions and Routines Policy.

6.08 Transitions and Routines Policy

INTRODUCTION

Transitions occur throughout a child's day and include moving between home, school, OOSH, activities, indoor and outdoor areas, excursions, vacation care experiences and collection. My Time, Our Place V2.0 recognises continuity and transitions as an ongoing practice that supports children and young people to feel secure, confident, connected and a sense of belonging across the different settings in their lives.

PURPOSE

Cubby OOSH aims to support safe, positive and individualised transitions while maintaining flexible routines that reflect the play and leisure-based nature of school age care. Routines will provide enough predictability for safety and wellbeing without unnecessarily interrupting children's play, relationships, choice, relaxation or agency.

SCOPE

This policy applies to before school care, after school care and vacation care and includes transitions between home and OOSH, school and OOSH, areas within the service, activities and routines, excursions and transport, and the commencement of school or OOSH.

GUIDING PRINCIPLES

- Transitions are processes rather than single events and may require different levels of support over time.
- Children and young people will have an active role in preparing for transitions and changes that affect them.
- Family knowledge, children's views and information from schools or other professionals will be used, where appropriate and authorised, to strengthen continuity.
- Routines will be predictable where this supports children, but flexible enough to respond to age, interests, culture, disability, neurodiversity, fatigue, sensory needs, wellbeing and individual circumstances.
- Safety and accurate accounting for children are essential during every physical transition.

TRANSITIONS BETWEEN HOME AND OOSH

- Educators will warmly acknowledge children and families on arrival and collection and provide opportunities to share relevant information.
- Children will be supported to use settling strategies that work for them, including familiar activities, friends, quiet spaces, movement, comfort items or time with a trusted educator where appropriate.
- Educators will avoid assuming all children require the same goodbye or settling routine.
- Children will not be forced to separate from a family member in a particular way, participate immediately in a group activity or discuss personal information publicly.
- Families will be informed of significant or ongoing settling concerns and invited to collaborate on responsive strategies.
- Arrival and departure records will be completed accurately and children will only leave the service in accordance with authorised collection requirements.

TRANSITIONS BETWEEN SCHOOL AND OOSH

- Safe arrival arrangements between school and OOSH will be implemented in accordance with the service's Safe Arrival of Children Policy and current National Regulations.
- Responsibilities for the child's movement between school and OOSH will be clear, including where and when responsibility transfers between the school, family and service.
- Attendance will be reconciled promptly. Where an expected child has not arrived, educators will follow the service's absence and missing-child procedures without relying on an arbitrary waiting period before escalating a genuine safety concern.
- Children new to Kindergarten, the school or OOSH will receive additional support to understand where to go, who will meet them and what to do if arrangements change.
- Where authorised and appropriate, educators will work with families and schools to share information that supports continuity, inclusion, wellbeing and safe transitions.
- Children's increasing independence will be recognised, but independence will not replace the service's duty to provide adequate supervision and accurately account for children.

MOVEMENT WITHIN THE SERVICE

- Educators will plan movement between indoor and outdoor areas, rooms, levels or shared school spaces so that adequate supervision and accurate accounting for children are maintained.
- Before and after a group moves, educators will use appropriate attendance checks, head counts or roll reconciliation based on the context and risk. A blanket 30-minute head-count interval is not relied on as the primary control.
- Educators will communicate changes in supervision zones and responsibility to one another before children move.
- Children will be given clear, age-appropriate information about where they are going and any relevant boundaries or hazards.
- Movement strategies will reflect the age and capabilities of school-age children. Walking ropes or similar equipment will not be used routinely; any use must be justified by the individual risk, child's needs and dignity.
- Routes and destination spaces will be checked for accessibility and barriers so children with disability or additional needs can participate safely and equitably.

TRANSITIONS DURING EXCURSIONS, TRANSPORT AND SERVICE EVENTS

- Relevant excursion, transportation, road safety, water safety and centre-event risk assessments and procedures will be followed.
- Educators will account for children at critical transition points such as departure, boarding, disembarking, entering or leaving venues, changing groups and returning to the service.
- Where transport is used, embarkation and disembarkation records and required physical vehicle checks will be completed in accordance with current National Regulations.
- Roads, car parks, crowds, water, unfamiliar environments and other identified hazards will be actively managed through the excursion or transport risk assessment.
- Children will receive safety information in ways they can understand and will be supported to ask questions or raise concerns.
- Transitions will be organised so that children are not unnecessarily rushed, shamed or placed under pressure that compromises safety or wellbeing.

ROUTINES IN SCHOOL AGE CARE

Cubby OOSH is a play and leisure-based service. Routines provide a supportive framework for the session but are not intended to reproduce the structure of the school day.

- Routines will support children's wellbeing, comfort, relationships, play, leisure, food, rest, relaxation and participation.
- Where possible, routines will minimise unnecessary interruption to sustained play, projects, conversations and peer relationships.
- Children will have meaningful choices within routines, including opportunities for active play, quiet time and relaxation.
- Whole-group routines will only be used where they have a clear purpose and will be kept proportionate to children's age and the OOSH context.
- Educators will use visual schedules, verbal reminders, advance warnings, first/then information or other transition supports where these are helpful to an individual child; such tools will not be imposed where they increase distress.
- Children will be involved in reviewing routines and suggesting changes to how the session operates.
- Changes to routine will be communicated in advance where practicable, particularly for children who benefit from predictability.

CHILD VOICE, CHOICE AND AGENCY

- Children will be invited to contribute to decisions about routines, transition strategies, spaces and group movement where appropriate.
- Educators will listen to children's concerns about transitions and respond rather than treating reluctance or distress simply as non-compliance.
- Children may choose whether to participate in optional activities, subject to reasonable safety, supervision and operational boundaries.
- Children will be supported to develop independence and responsibility at a pace appropriate to their age, capability and circumstances.
- No child will be humiliated, threatened, yelled at or isolated as a way of making them comply with a transition or routine.

INCLUSION AND INDIVIDUAL TRANSITION SUPPORT

- Transition difficulties will be considered in the context of the child's communication, disability, neurodiversity, sensory profile, trauma history, culture, language, relationships, fatigue and previous experiences.
- A diagnosis is not required before reasonable adjustments or supportive strategies are considered.
- Strategies may include smaller-group transitions, preferred peers, additional time, visual or verbal prompts, quiet routes, movement opportunities, familiar educators or changes to the environment.
- Where appropriate and with consent, the service may collaborate with families, schools, inclusion professionals or other providers to support continuity.
- Children will not have their attendance restricted solely because transitions are difficult without first considering safety, reasonable adjustments, available supports and the child's rights and best interests.

TRANSITION TO SCHOOL

Where Cubby OOSH supports a child who has not yet commenced formal schooling, the service will work with the child, family and relevant early childhood or school professionals to support a positive

transition. This may include talking about school, answering questions, building familiarity with the environment and supporting practical self-help skills through everyday play and routines.

- School-readiness activities will not replace play and leisure or pressure children to demonstrate academic skills before school.
- The service will use NSW school commencement information relevant to NSW families rather than maintaining unrelated ACT, Queensland and Victorian eligibility rules in this policy.
- In NSW, children may enrol in Kindergarten at the beginning of the school year if they turn five on or before 31 July that year, and children must be enrolled in school by their sixth birthday, subject to current NSW requirements.
- Where appropriate, transition information will be shared with the school only with family consent or where otherwise permitted or required by law.

SAFETY, RIGHTS AND BEST INTERESTS

Where a transition or routine decision directly affects a child, the child's safety, rights and best interests will be the paramount consideration. Operational convenience, rigid routines or adult preferences will not take priority over a child's safety and rights. Children's views will be considered in a manner appropriate to their age, maturity, communication and circumstances, while educators continue to meet legal supervision, attendance and safety duties.

RESPONSIBILITIES

Approved Provider / Nominated Supervisor

- ensure service procedures support safe arrival, departure, excursions, transport, movement and emergency transitions;
- ensure staffing and supervision arrangements remain adequate during transition periods;
- support collaboration with families, schools and other professionals where appropriate and authorised;
- ensure routines and transition practices reflect MTOP V2.0, inclusion and child-safe practice; and
- review transition arrangements following incidents, near misses, significant changes or feedback from children and families.

Educators

- know which children they are responsible for and communicate changes in supervision responsibility;
- accurately account for children at relevant transition points;
- provide clear, respectful and age-appropriate information before changes occur;
- respond to individual transition needs and implement agreed reasonable adjustments;
- protect children's dignity and agency while maintaining safety; and
- share relevant observations with families and the Nominated Supervisor/Responsible Person.

Families

- provide current information about attendance, collection arrangements and changes that may affect the child's transition or wellbeing;
- notify the service of absences or changes to school/OOSH arrangements as early as possible;
- share strategies and information that help the child feel secure and included; and
- keep authorised nominee, contact, medical and relevant support information current.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including current paramount consideration and child-safety duties where relevant.
- Education and Care Services National Regulations, including Regulation 73 Educational program; Regulation 76 Information about educational program to be given to parents; Regulations 99 and 158 relating to children leaving the service and authorisations; Regulations 102AAB-102AAC relating to safe arrival of children; applicable excursion and transportation requirements; and Regulation 254 Declared approved learning framework.
- National Quality Standard - Element 1.1.3 Program learning opportunities; Element 2.1.1 Wellbeing and comfort; Standard 2.2 Safety; Element 4.1.2 Continuity of staff; Element 5.1.1 Positive educator to child interactions; Element 6.1.2 Parent views are respected; Element 6.2.1 Transitions; Element 6.2.2 Access and participation; and Standard 7.1 Governance.
- My Time, Our Place: Framework for School Age Care in Australia V2.0 - Continuity and transitions; Partnerships; Equity, inclusion and high expectations; Secure, respectful and reciprocal relationships; and Play, leisure and intentionality.
- Disability Discrimination Act 1992 (Cth) and applicable NSW anti-discrimination requirements.
- NSW school enrolment requirements, where transition to school applies.

SOURCES

- ACECQA - My Time, Our Place: Framework for School Age Care in Australia V2.0.
- ACECQA - Information Sheet: MTOP Practices - Continuity and transitions.
- ACECQA - Information Sheet: MTOP Principles - Partnerships.
- ACECQA - Supporting children's transitions and OSHC/school partnership guidance.
- ACECQA - Guide to the National Quality Framework, current 2026 edition.
- NSW Early Learning Commission - current child-safety and paramountcy requirements.
- NSW Department of Education - current Kindergarten enrolment information.
- Cubby OOSH Safe Arrival, Orientation, Excursion, Transportation, Inclusion, Interactions and Child Safe Environment policies.

6.09 Excursion Policy

INTRODUCTION

Excursions and regular outings are valuable parts of a school age care program. They provide children with opportunities for recreation, play, leisure, community connection, exploration and new experiences beyond the service premises. Cubby OOSH will plan excursions collaboratively and ensure that risks are identified and managed without removing appropriate opportunities for children to participate, exercise choice and engage with their community.

PURPOSE

To ensure excursions and regular outings are planned, authorised, supervised and conducted in accordance with the Education and Care Services National Law and Regulations, current NSW requirements and Cubby OOSH procedures, with children's safety, rights, wellbeing and best interests central to decision-making.

SCOPE

This policy applies whenever children are taken outside the education and care service premises as part of an excursion or regular outing during before school care, after school care or vacation care. Transportation requirements apply where the service provides or arranges transport as part of the excursion.

EXCURSION PLANNING

- Excursions will be selected with regard to children's interests, age, capabilities, inclusion needs, cultural context, leisure opportunities and the benefits of community participation.
- Children will be given age-appropriate opportunities to contribute ideas, ask questions and participate in planning where practicable.
- The Approved Provider, Nominated Supervisor or delegated person will ensure the proposed excursion is suitable and that all required risk assessment, authorisation, staffing, supervision, first aid, medical and transport arrangements are in place before departure.
- Where practical, the destination or route may be inspected in advance or reliable current information obtained about access, toilets, drinking water, shade, emergency access, mobile coverage, traffic, crowds, water and other relevant conditions.
- Incursions or centre events that do not involve children leaving the service premises are not excursions under Regulations 100-102, but must still be appropriately risk assessed where hazards are identified.

EXCURSION RISK ASSESSMENT

A risk assessment must be conducted before an excursion in accordance with Regulations 100 and 101. For a regular outing, a new risk assessment is not required where one has been completed within the previous 12 months and the circumstances relevant to the assessment remain substantially the same.

The excursion risk assessment will identify and assess risks to children's safety, health and wellbeing and specify how risks will be managed and minimised. It will consider, as applicable:

- the proposed route, destination and any alternative route or location arrangements;
- the duration of the excursion and departure/return arrangements;
- the proposed activities and any activity-specific hazards;

- water hazards and risks associated with water-based activities;
- the means of transport and, where children are transported, applicable seatbelt or child-restraint requirements;
- the number, age, capabilities and needs of children likely to attend;
- the anticipated educator-to-child ratio and whether additional educators or responsible adults are required to provide adequate supervision;
- whether specialised skills are required, such as aquatic rescue or other activity-specific competencies;
- road crossings, car parks, public transport, crowds, unfamiliar environments, animals, weather, heat, bushfire, air quality or other relevant environmental risks;
- toileting, privacy, accessibility and inclusion requirements;
- children's medical conditions, allergies, emergency medication, disability, behaviour-support or individual safety needs;
- arrangements for accounting for children at departure, arrival, transitions, transport, activity changes and return;
- emergency communication, emergency response and evacuation arrangements; and
- items that must be taken, including attendance information, emergency contacts, first aid equipment, medical management plans and emergency medication.

CHANGE IN CIRCUMSTANCES

- A regular-outing risk assessment must be reviewed and updated when circumstances relevant to the assessment change.
- Changes may include a different route or destination, altered activities, significant weather or environmental conditions, different transport arrangements, changes in attendance or children's needs, new hazards, incidents or changes affecting supervision.
- The Responsible Person will consider conditions on the day and may modify, postpone or cancel an excursion where identified risks cannot be adequately managed.

PARENT / AUTHORISED PERSON AUTHORISATION

A child will not be taken on an excursion unless written authorisation has been provided by a parent or another person named in the child's enrolment record as authorised to give permission for the child to leave the premises.

The authorisation will include the information required by Regulation 102, including:

- the child's name;
- the reason the child is to be taken outside the service premises;
- for a non-regular excursion, the date of the excursion; or, for a regular outing, a description of when the child is to be taken on the regular outings;
- the proposed destination;
- where transport is involved, the means of transport and any applicable seatbelt or safety-restraint requirements;
- the proposed activities;
- the period the child will be away from the premises;
- the anticipated number of children attending;

- the anticipated educator-to-child ratio;
- the anticipated number of staff members and other adults who will accompany and supervise the children; and
- confirmation that a risk assessment has been prepared and is available at the service.

For a regular outing, written authorisation is generally required once in a 12-month period. A new or updated authorisation will be obtained where required because circumstances materially change.

FAMILY ACCESS TO RISK ASSESSMENTS

- Families will be informed that an excursion risk assessment has been prepared and is available at the service.
- A parent or authorised person may request to view the risk assessment before the excursion.
- Information shared with families will be sufficient to support informed authorisation while protecting confidential information about other children.

SUPERVISION AND STAFFING

The ordinary NSW educator-to-child ratio for children over preschool age remains the applicable minimum ratio. Excursions do not have separate blanket legal ratios such as 1:10, 1:8 or 1:5 merely because the excursion involves walking or water. The excursion risk assessment must determine whether more educators or other responsible adults are required to provide adequate supervision for the specific excursion.

- Adequate supervision will be determined from the environment, activities, children's ages and abilities, visibility, accessibility, water or traffic hazards, transport, group size and individual support needs.
- Educators counted in ratio must meet applicable requirements and be working directly with children.
- Additional adults may supplement supervision where appropriate but do not replace required educators or transfer the service's duty of care.
- Family members or other accompanying adults who are not staff will receive clear instructions and must not be left alone with children unless lawfully authorised, appropriately screened and permitted under service procedures.
- Children requiring additional support will be included through individualised planning and reasonable adjustments. Additional staffing will be considered according to assessed need rather than a diagnosis or funding status alone.
- Supervision zones, educator responsibilities and group arrangements will be communicated before departure and adjusted when conditions change.

ACCOUNTING FOR CHILDREN

- A current list of children attending will accompany the excursion and be reconciled against the service attendance record before departure.
- Children will be accounted for at critical transition points, including departure, arrival at the destination, boarding and leaving transport, movement between areas or activities, toileting transitions and return to the service.
- Head counts may form part of the supervision strategy but do not replace active supervision, roll reconciliation or educator knowledge of which children are in their care.

- If a child is missing or cannot be accounted for, educators will act immediately in accordance with emergency, missing-child and incident procedures, including contacting Police on 000 where required. There is no mandatory waiting period before seeking emergency assistance.
- Any incident that meets the serious-incident or other notification threshold will be notified in accordance with current regulatory requirements.

TRANSPORTATION

Where the service provides or arranges transportation as part of an excursion, the excursion risk assessment and authorisation must address the transport. The service will also comply with Regulations 102B-102F where those provisions apply.

- The vehicle's lawful seating capacity must not be exceeded and every child must occupy an appropriate seating position.
- Seatbelts and child restraints must be used in accordance with current NSW road law and the type of vehicle being used.
- Children will be actively supervised while boarding, travelling and disembarking, with particular attention to car parks, roads and vehicle blind spots.
- Where applicable, embarkation/disembarkation records and required physical vehicle checks will be completed to ensure no child is left in a vehicle.
- Public transport arrangements will be planned to allow safe boarding, travel and disembarking. The service will contact the operator in advance where this is reasonably necessary for safe group travel, rather than treating advance contact as a universal legal requirement.
- The service's Transportation and Road Safety policies must be followed in addition to this policy.

FIRST AID, MEDICAL CONDITIONS AND EMERGENCIES

- The service will ensure the required first aid, anaphylaxis management and emergency asthma management qualifications are immediately available during the excursion in accordance with Regulation 136.
- An appropriately stocked and accessible first aid kit will accompany the group.
- Required emergency medication, medical management plans and risk-minimisation information will accompany children and remain immediately accessible to educators.
- A reliable means of communication will be available for emergencies and educators will know the destination address/location and how emergency services can access the group.
- Emergency arrangements will consider evacuation, shelter, severe weather, bushfire, medical emergencies, missing children and other risks identified for the excursion.

WATER-BASED EXCURSIONS

- Water hazards and water-based activities will be specifically assessed under Regulation 101.
- Staffing and supervision will be increased where the risk assessment indicates this is necessary; a blanket 1:5 ratio is not substituted for a site-specific assessment.
- The assessment will consider swimming ability, water depth and conditions, visibility, access/egress, lifeguard arrangements, rescue equipment, educator positioning and whether specialised rescue skills are required.
- Children will receive clear safety instructions and be supported to participate at a level appropriate to their ability, confidence and authorised activity.

CHILD VOICE, INCLUSION AND PARTICIPATION

- Children will be provided with information about the excursion in ways they can understand and encouraged to ask questions or raise concerns.
- Participation will be inclusive and reasonable adjustments considered for children with disability, medical conditions, neurodiversity, cultural requirements or other support needs.
- Where a child is anxious or does not wish to participate, educators will explore the reason and available supports rather than using shame, threats or coercion.
- Where a child does not attend an excursion, arrangements for education and care will be communicated with the family in accordance with service bookings and operational arrangements.

DIGITAL DEVICES, IMAGES AND PRIVACY

- Current National Law restrictions on personal devices apply while educators and other workers are working directly with children.
- A personal device may only be used on an excursion where a lawful excursion exception applies and the device is genuinely necessary for children's safety or to support education and care.
- The excursion exception does not permit personal devices to capture, store or transmit images of children.
- Service-supplied devices, photographs and digital records will be managed in accordance with Cubby OOSH's Safe Use of Digital Technologies and privacy requirements.
- Emergency contacts, medical information and other personal information taken on an excursion will be secured and accessed only by people who need it.

SAFETY, RIGHTS AND BEST INTERESTS

Excursion decisions directly concern children and therefore children's safety, rights and best interests will be the paramount consideration. This applies when selecting activities, determining staffing and supervision, responding to changes in conditions, deciding whether an excursion should proceed and balancing cost or operational convenience against identified risks. Children's views and experiences will be considered where appropriate.

RESPONSIBILITIES

Approved Provider / Nominated Supervisor

- ensure compliant excursion policies, risk assessments and authorisations are in place;
- ensure adequate staffing, supervision, first aid, medical and transport arrangements;
- ensure significant risks, incidents and changes are documented and acted on;
- ensure required regulatory notifications are made; and
- review excursion practices following incidents, near misses, feedback or changes in law.

Responsible Person / Excursion Leader

- confirm attendance, authorisations, risk controls, staffing, emergency information and required equipment before departure;
- brief educators and accompanying adults about responsibilities, supervision zones, emergency procedures and identified hazards;

- monitor conditions and adjust controls throughout the excursion;
- ensure children are accounted for at all critical transition points; and
- report incidents, hazards, missing-child concerns or material changes immediately.

Educators

- actively supervise children and know which children they are responsible for;
- implement the risk assessment and communicate when supervision arrangements change;
- support children's dignity, inclusion, agency and safe participation;
- keep emergency medication and required information accessible; and
- comply with digital-device, privacy, transport and child-safe requirements.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including sections 165, 167 and current NSW paramount consideration and child-safety requirements.
- Education and Care Services National Regulations, including Regulation 89 First aid kits; Regulation 99 Children leaving the service premises; Regulations 100-102 Excursions; Regulations 102B-102F Transportation where applicable; Regulation 136 First aid qualifications; Regulation 168 Required policies and procedures; and applicable record and notification requirements.
- National Quality Standard - Element 2.2.1 Supervision, Element 2.2.2 Incident and emergency management, Quality Area 3 Physical Environment, Quality Area 5 Relationships with Children and Quality Area 6 Collaborative Partnerships.
- My Time, Our Place: Framework for School Age Care in Australia V2.0 - play and leisure, community connection, partnerships, equity and inclusion, child agency and continuity/transitions.
- Current NSW road transport and child-restraint laws where motor vehicles are used.

SOURCES

- ACECQA - Guide to the National Quality Framework, current 2026 edition.
- ACECQA - Quality Area 2: Children's Health and Safety - Excursions.
- ACECQA - Excursions Policy Guidelines and excursion risk-management guidance.
- ACECQA - Safe Transportation of Children and Active Supervision guidance.
- NSW Early Learning Commission - current child-safety reforms and paramountcy guidance.
- Transport for NSW - current road, seatbelt and child-restraint requirements.
- Cubby OOSH Excursion Permission Note, Excursion Risk Assessment and related Medical, First Aid, Child Protection, Emergency, Transportation, Road Safety, Water Safety, Digital Technology and Child Safe Environment policies.

6.10 Centre Events Policy

INTRODUCTION

Centre events can strengthen children's connections with families, schools and the wider community and create opportunities for celebration, play, leisure, belonging and shared experiences. Cubby OOSH will plan events in ways that are inclusive, culturally responsive and child safe, while maintaining adequate supervision and clear responsibility for children who remain in the service's care.

PURPOSE

To provide a consistent framework for planning, risk assessing, conducting and reviewing centre events held at or within the service premises, including family events, celebrations, community visits, performances, workshops and special activities.

SCOPE

This policy applies to centre events where children remain on the education and care service premises. If children leave the service premises, the Excursion Policy and Regulations 100-102 apply. Where transportation is provided or arranged, the Transportation Policy and applicable transport requirements also apply.

GUIDING PRINCIPLES

- Events will reflect children's interests, family and community connections, culture, diversity and the play and leisure-based nature of OOSH.
- Children and families will have meaningful opportunities to contribute ideas and feedback without being required to participate.
- Family and community participation does not transfer the service's duty of care or replace educator supervision while a child remains signed into care.
- Events will be accessible and inclusive, with reasonable adjustments considered for disability, medical, sensory, communication, cultural and other needs.
- Planning will balance the benefits of community participation with child safety, privacy, dignity and wellbeing.

PLANNING A CENTRE EVENT

- The Nominated Supervisor or delegated event lead will identify the purpose, proposed activities, date, time, location, expected attendance and responsibilities for the event.
- Children will be consulted in age-appropriate ways about event ideas, activities and how they would like to participate.
- Families will be given reasonable notice where practicable. A fixed two-week notice period or one-week RSVP period is not required for every event; notice will reflect the scale and circumstances of the event.
- Where attendance numbers may affect supervision, access, food, emergency arrangements or space, an RSVP or other attendance estimate will be used.
- Staffing will be planned for the children booked into care and the additional supervision demands created by visitors, activities, altered spaces or entry/exit points.
- The service will consider school-site requirements, shared premises, security, emergency access, contractor or provider requirements and any approvals needed from the school or site owner.

- External providers will be assessed for suitability, safety and child-safe practice, including qualifications, insurance or screening where relevant to the activity and their role.

RISK ASSESSMENT

A centre event that remains on the service premises is not automatically an excursion and Regulations 100-102 do not apply merely because an event is occurring. Cubby OOSH will nevertheless complete or review a Centre Event Risk Assessment where the event introduces new or changed hazards or supervision demands.

The risk assessment will consider, as relevant:

- changes to normal supervision zones, entrances, exits, gates and child collection points;
- expected numbers of children, families, visitors and external providers;
- visitor access to children, toilets, staff-only areas, records or personal information;
- food safety, allergies, choking risks and safe food handling;
- crowding, furniture, temporary equipment, electrical leads, marquees, decorations, stages or activity equipment;
- weather, heat, storms, smoke, bushfire or outdoor conditions;
- medical conditions, emergency medication, first aid and emergency access;
- children who may become overwhelmed, anxious, dysregulated or require additional transition or sensory support;
- photography, filming, digital devices and privacy;
- emergency evacuation or lockdown arrangements when additional people are present; and
- how children will be accurately accounted for throughout the event and during collection.

BEFORE THE EVENT

- Review the Centre Event Risk Assessment and implement identified controls.
- Confirm the roster provides adequate supervision for children in care. Additional educators will be rostered where the risk assessment indicates they are needed; visitor numbers alone do not change the statutory educator-to-child ratio but may increase supervision demands.
- Allocate educator responsibilities such as supervision zones, arrival/visitor management, food safety, first aid, collection/sign-out and activity oversight.
- Brief staff about the event plan, identified hazards, child-specific needs, visitor arrangements, emergency procedures and who is responsible for each area.
- Ensure required first aid equipment, emergency medication and medical management plans remain accessible.
- Confirm the environment remains accessible and that reasonable adjustments have been made where required.
- Communicate relevant information to families, including event times, participation arrangements, food or allergy information, photography expectations and any changes to normal arrival or collection procedures.

VISITORS, FAMILIES AND COMMUNITY MEMBERS

- Families will be welcomed in accordance with the Open Door Policy, Regulation 157, service security procedures and any applicable court orders or safety restrictions.
- Visitors and external providers will be identifiable and managed in accordance with service visitor and child-safe procedures. Attendance or visitor records will be maintained where required for safety and emergency accounting.
- Parents attending an event do not automatically assume responsibility for their child while the child remains signed into OOSH care. Responsibility transfers only through the normal authorised collection/sign-out process.
- Visitors, volunteers and community members will not be left alone with children unless their role is lawful, appropriately screened and specifically authorised under service procedures.
- Adults attending events must follow reasonable directions relating to child safety, privacy, smoking/vaping, alcohol or other substances, behaviour, restricted areas and emergency procedures.
- Where a person's conduct creates a risk to children or others, the service may restrict or end their participation and take further action consistent with law and service policy.

SUPERVISION DURING THE EVENT

- Educators will maintain adequate supervision at all times and will not assume that parents, visitors or external presenters are supervising children who remain in care.
- Supervision positions will account for changed layouts, crowds, blind spots, gates, toilets, food areas and activities with higher risk.
- An educator leaving an allocated supervision area must communicate with colleagues and ensure responsibility is transferred before leaving.
- Attendance records will remain accurate. Children leaving with an authorised person must be signed out in accordance with service procedures.
- Children whose family members do not attend will be supported to participate without being singled out or treated as requiring separate supervision solely for that reason.
- If staffing becomes insufficient for adequate supervision, the event plan or activities will be modified and additional staffing sought where necessary. Cost or convenience will not override child safety.

FOOD AND ALLERGY SAFETY

- Food provided or brought to an event will be managed in accordance with Cubby OOSH Food and Nutrition, Medical Conditions, Anaphylaxis, Food Allergy and Intolerance and Hygiene policies.
- Known allergies, dietary requirements and risk-minimisation strategies will be considered before food is served or shared.
- Food will be stored, prepared, displayed and served safely, with temperature control and hygiene measures applied where required.
- Children will be appropriately supervised while eating. Food will not be used to exclude, shame or pressure a child.
- Families will be given clear instructions where food brought from home could create an unacceptable allergy or food-safety risk.

PHOTOGRAPHY, FILMING AND DIGITAL DEVICES

- Photography and filming at centre events will comply with Cubby OOSH privacy, consent and Safe Use of Digital Technologies requirements.
- Families and visitors will be reminded not to photograph or record other children unless the service has confirmed appropriate permission and the recording is consistent with service procedures.
- Staff, volunteers and other workers must comply with current National Law restrictions on personal devices while working directly with children.
- Images of children created for service purposes will only be captured, stored, accessed and shared through approved service processes and devices.
- Where photography could compromise a child's safety, privacy, court order or family circumstances, those protections will take priority.

CHILD VOICE, CULTURE AND INCLUSION

- Children will be invited to help plan, choose and evaluate events and may choose whether to participate in optional activities.
- Celebrations will be culturally responsive and avoid tokenism, stereotypes or assumptions that all children and families celebrate the same events.
- Children will not be required to disclose personal, cultural, religious or family information as a condition of participating.
- Alternatives will be available where a child or family does not participate in a particular celebration or activity.
- Reasonable adjustments will be considered so children with disability, neurodiversity, medical conditions or additional needs can participate safely and meaningfully.

EMERGENCIES AND INCIDENTS

- Normal emergency, evacuation, lockdown, incident, injury, trauma and illness procedures remain in effect during centre events.
- Emergency routes and exits must remain clear and additional visitors must be considered in emergency accounting and evacuation arrangements.
- Visitors will follow educator directions during an emergency and must not remove a child who is signed into care without completing the authorised collection process unless directed by emergency services or otherwise required by law.
- Incidents, injuries, hazards, child-protection concerns or other matters arising during the event will be documented and notified where current legal thresholds require it.

AFTER THE EVENT

- Review any incidents, near misses, hazards, supervision issues or unexpected changes and update the Centre Event Risk Assessment or related procedures where necessary.
- Seek feedback from children, families, educators and relevant community participants in ways proportionate to the event.

- Use critical reflection to consider what supported children's inclusion, enjoyment, safety, relationships and community connection and what could improve next time.
- Record significant learning or improvement actions in the program, reflection records, risk-management system or Quality Improvement Plan where relevant.

SAFETY, RIGHTS AND BEST INTERESTS

Because centre events may change the environment, introduce visitors and alter normal supervision arrangements, children's safety, rights and best interests will be the paramount consideration in decisions that affect them. Children's views will be considered where appropriate, and event popularity, adult expectations, cost, convenience or reputation will not take priority over child safety and rights.

RESPONSIBILITIES

Approved Provider / Nominated Supervisor

- ensure centre-event planning and risk controls are appropriate to the event and service context;
- ensure adequate staffing, supervision, first aid, medical, visitor and emergency arrangements;
- ensure external providers and visitors are managed under child-safe procedures;
- ensure incidents or concerns are escalated and notified where required; and
- review event practices following feedback, incidents, near misses or changes in law.

Educators

- understand their allocated role and supervision responsibilities;
- maintain accurate attendance and authorised collection practices;
- implement food, allergy, privacy, digital-device and risk controls;
- support children's choice, dignity, inclusion and participation; and
- report hazards, incidents or child-safety concerns promptly.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including sections 165 and 167 and current NSW paramount consideration and child-safety requirements where relevant.
- Education and Care Services National Regulations, including Regulation 99 where a child leaves the premises; Regulation 157 access for parents; Regulation 168 required policies and procedures; applicable attendance, supervision, first aid, medical-condition, emergency and record requirements; and Regulations 100-102 only where an activity is an excursion because children leave the service premises.
- National Quality Standard - Quality Area 2 Children's Health and Safety; Quality Area 5 Relationships with Children; Quality Area 6 Collaborative Partnerships with Families and Communities, particularly Element 6.2.3 Community engagement; and Quality Area 7 Governance and Leadership.
- My Time, Our Place: Framework for School Age Care in Australia V2.0 - partnerships, community engagement, respect for diversity, equity and inclusion, play and leisure, and child agency.
- NSW Child Safe Standards and current child-safe environment requirements where visitors, volunteers, external providers or community members participate in service activities.

SOURCES

- ACECQA - Guide to the National Quality Framework, current 2026 edition.
- ACECQA - Quality Area 6: Collaborative partnerships with families and communities.
- ACECQA - My Time, Our Place: Framework for School Age Care in Australia V2.0.
- NSW Early Learning Commission - current child-safety reforms and paramountcy guidance.
- NSW Office of the Children's Guardian - Child Safe Standards.
- Cubby OOSH Centre Event Risk Assessment Plan and related Open Door, Medical Conditions, Food and Nutrition, Emergency, Child Protection, Privacy, Digital Technology and Child Safe Environment policies.

CUBBY OOSH – QUALITY AREA 6 POLICY UPDATE REGISTER

Collaborative Partnerships with Families and Communities: September 2026

Register summarises the September 2026 updates made to Cubby OOSH Quality Area 6 policies 6.01–6.10. Current QA6 framework reference: https://www.acecqa.gov.au/nqf/national-quality-standard/quality-area-6-collaborative-partnership-with-families-and-communities

Policy Number	Policy Name	What changed – September 2026
6.01	Partnerships with Families Policy	Strengthened respectful and collaborative family partnerships; enrolment and orientation communication; family expertise and shared decision-making; child voice, privacy and increasing

		independence; optional family participation; Regulation 157 parent access; school-age/OOSH programming and documentation; inclusion, equity and cultural responsiveness; transitions, schools and community services; feedback, complaints and QIP links; selective paramountcy where family decisions directly affect a child.
6.02	Developing Partnerships with Cultural and Linguistically Diverse Families	Reframed cultural responsiveness beyond festivals and tokenism; strengthened language access, interpreting and plain-language communication; home language as a strength; culturally responsive MTOP V2.0 programming; anti-racism and barrier removal; voluntary family cultural sharing; child identity, privacy and agency; accessible complaints; selective paramountcy where cultural or language decisions affect safety, dignity, rights, inclusion or wellbeing.
6.03	Aboriginal & Torres Strait Islander Awareness Policy	Updated to contemporary, culturally safe and strengths-based practice; distinguished Acknowledgement of Country from Welcome to Country; strengthened RAP and Narragunnawali links; year-round Aboriginal and Torres Strait Islander perspectives rather than tokenistic events; authentic resources and cultural permissions; local community relationships and recognition of cultural expertise; anti-racism, child identity and agency; current MTOP V2.0 and QA6 references; selective paramountcy.
6.04	Open Door Policy	Clarified that an open-door philosophy does not mean unrestricted or unsecured physical access; accurately incorporated Regulation 157 parent access and exceptions; strengthened visitor, contractor and security controls; court orders and restricted access; arrival, collection and attendance; privacy, photography and digital-device safeguards; family participation without replacing educator supervision; child-safe visitor boundaries; selective paramountcy for access and visitor decisions affecting children.
6.05	Informing Families of Our Policies	Strengthened family access to current policies and procedures; multiple consultation and feedback methods; child and young person input where policies directly shape their OOSH experience; policy review triggers and version control; corrected Regulation 172 family-notification requirements, including the 14-day rule and safety exception; accessible communication, translations and interpreting; privacy and confidentiality; selective paramountcy only where a policy decision directly concerns a child.
6.06	Complaints & Grievance Procedures for Families	Rebuilt as a child-focused complaints process; accessible verbal and written complaint pathways; immediate risk assessment; 24-hour regulatory notification requirements; child protection, OCG reportable conduct and Police escalation; harmful sexual behaviours between children; procedural fairness and conflicts of interest; realistic investigation

		timeframes; privacy, complaint records and external review; protection from victimisation; continuous improvement; strong paramountcy because complaints may directly concern child safety and rights.
6.07	Orientation of New Children & Families Policy	Made the policy specifically school-age/OOSH focused; flexible and individualised orientation rather than compulsory visits; strengthened enrolment records and authorisations; child and family voice; medical plans, court orders and authorised collection; safe arrival and Kindergarten transitions; inclusion and reasonable adjustments; cultural responsiveness; privacy and ongoing settling support; clarified NSW school-age immunisation position; selective paramountcy for enrolment and orientation decisions affecting a child.
6.08	Transitions and Routines Policy	Updated to MTOP V2.0 continuity and transitions; strengthened home-to-OOSH and school-to-OOSH transitions, safe arrival and attendance reconciliation; safer movement within the service, excursions and transport; removed blanket 30-minute head-count rule and routine walking-rope approach; flexible leisure-based OOSH routines; child voice and agency; inclusion, neurodiversity and individual transition supports; NSW-specific transition-to-school information; selective paramountcy.
6.09	Excursion Policy	Comprehensively updated Regulations 100–102 excursion risk assessment and authorisation requirements; regular outings and changed circumstances; corrected the old blanket excursion/walking/water ratios and replaced them with adequate-supervision and risk-based staffing requirements; strengthened accounting for children, transport and vehicle checks, first aid and medical needs, water excursions, child voice and inclusion, digital-device/image restrictions and emergency response; strong paramountcy because excursion decisions directly involve child safety and risk.
6.10	Centre Events Policy	Clarified that on-site centre events are not automatically excursions; strengthened event-specific risk assessment, staffing and supervision, visitor and external-provider controls, family participation, food and allergy safety, attendance and authorised collection, emergency arrangements, photography and digital-device safeguards, child voice, cultural inclusion and post-event critical reflection; removed rigid two-week notice and one-week RSVP rules; clarified that family attendance does not automatically transfer duty of care while a child remains signed into OOSH; selective paramountcy for event decisions affecting children.

CUBBYOOSH

ACTIVE & ENGAGING OUT OF SCHOOL HOURS CARE

Quality Area 7

7.01 Communication Policy

INTRODUCTION

Positive, respectful and accessible communication is essential to the safe and effective operation of Cubby OOSH services. Communication supports strong relationships between school-age children and young people, families, educators, schools, management and the wider community, and helps ensure information affecting children's education, care, safety, wellbeing and participation is shared accurately and appropriately.

This policy is written specifically for Cubby OOSH Outside School Hours Care services, including before school care, after school care and vacation care. Children's age, maturity, communication needs, growing independence and the school-age care context will be considered when communicating with children and families.

PURPOSE

Cubby OOSH aims to maintain respectful, professional, inclusive and child-safe communication practices. Communication will support collaborative partnerships, effective teamwork, informed decision-making, confidentiality, children's participation and the timely sharing of information required for safe education and care.

SCOPE

This policy applies to the Approved Provider, persons with management or control, Nominated Supervisors, Responsible Persons, Educational Leaders, educators, employees, students, volunteers, contractors, children, families and visitors, where relevant.

GUIDING PRINCIPLES

- Communication is respectful, professional, culturally safe, inclusive and free from discrimination, intimidation, humiliation, threats or abusive language.
- Children and young people are listened to and supported to express their views, preferences, concerns and ideas in ways appropriate to their age, development and communication needs.
- Information is shared on a need-to-know basis and privacy and confidentiality are maintained in accordance with law and service policy.
- Communication methods are adapted where required, including use of interpreters, visual supports, alternative communication methods or additional time and support.
- Concerns involving child safety, health or wellbeing are escalated immediately and are not delayed by ordinary communication or grievance processes.

PARAMOUNT CONSIDERATION

Where communication, information-sharing or decision-making affects a child, the safety, rights and best interests of the child are the paramount consideration. These interests prevail over convenience, reputation, financial interests or adult preferences. Children's views and experiences will be considered where appropriate, and information will be shared with relevant people or authorities when required to protect a child.

IMPLEMENTATION – STAFF AND MANAGEMENT

- Educators, service leaders and management will communicate respectfully and use clear professional language in person, by telephone, in writing and through approved digital systems.
- Roles and escalation pathways will be clear. Routine operational matters should be raised with the Nominated Supervisor/Responsible Person or relevant manager. Urgent safety, child protection, regulatory or serious operational matters must be escalated immediately to the appropriate person.
- An employee is not required to provide a copy of a concern to a person who is the subject of that concern. Conflicts of interest will be managed and an alternative manager or investigator used where appropriate.
- Team meetings, handovers, communication records and approved service systems will be used to share information necessary for safe and consistent practice.
- Educators must read and act on relevant updates, policies, procedures, risk controls, medical information and service communications before or during their shift as required.
- Confidential staff, child and family matters must not be discussed with unauthorised people or in public areas, group chats or personal social media.

COMMUNICATION WITH FAMILIES

- Families will be welcomed and provided with clear information about the service, their child's experiences, wellbeing, participation and interests, and relevant policies and procedures.
- Communication may occur through face-to-face conversations, telephone, email, the approved service app/platform, notices, newsletters, meetings, documentation and other approved methods.
- Communication and documentation will reflect My Time, Our Place V2.0 and the play and leisure-based school-age care context. It will recognise children and young people as capable participants with increasing independence, established relationships, interests and experiences across home, school, OOSH and community settings.
- Families will be invited to contribute information about their child's interests, culture, routines, strengths, needs, goals and circumstances that may affect education and care.
- Sensitive conversations will occur privately where practicable. Educators will avoid discussing confidential information where other children or families can overhear.
- Families requiring detailed discussion may be offered a mutually suitable meeting time with the appropriate educator, Nominated Supervisor or management representative.
- Communication will be accessible and inclusive. Reasonable support will be provided for families with disability, literacy, language or communication needs.
- Complaints and grievances will be managed under the service complaints policy. Families may raise child-safety or regulatory concerns directly with external authorities and are not required to exhaust internal processes first.

COMMUNICATION WITH CHILDREN AND YOUNG PEOPLE

- Educators will communicate with children in a warm, responsive and respectful manner and use language suited to the child's age, development, culture and communication needs.

- School-age children and young people will be given genuine opportunities to express ideas, make choices, contribute to the leisure-based program and service decisions that affect them, and provide feedback or raise concerns.
- Educators will use calm, appropriate voice tone and volume. Shouting at, threatening, humiliating, belittling, intimidating or verbally abusing a child is not acceptable.
- Children's dignity and privacy will be protected. Sensitive matters will not be discussed in front of others unless appropriate, necessary and handled respectfully.
- Children who are distressed, upset, dysregulated or seeking help will be responded to promptly and supported through co-regulation and developmentally appropriate communication.
- Children with additional communication needs will be supported through appropriate strategies such as visuals, key words, communication devices, gestures, additional processing time or advice from families, schools and relevant professionals where appropriate and authorised.
- Children will be informed, in an age-appropriate way, about how they can raise a concern or complaint and who they can speak to if they feel unsafe.

STAFF-TO-STAFF COMMUNICATION

- Team members will treat each other with respect, courtesy and professionalism and support a culture where concerns can be raised safely.
- Professional disagreements will be addressed respectfully and away from children and families wherever possible.
- Information relevant to supervision, medical conditions, risk management, child protection, behaviour support, inclusion, authorised collection and other safety matters must be communicated accurately during handover and through approved records.
- Personal messaging or social media must not be used to share confidential child or family information unless specifically authorised and compliant with service policy and legal requirements.
- Where a concern cannot be resolved informally, the relevant grievance, complaints, child protection, reportable conduct or whistleblowing pathway will be followed as applicable.

PRIVACY, CONFIDENTIALITY AND DIGITAL COMMUNICATION

- Personal, sensitive and health information will only be collected, accessed, used, stored and disclosed for authorised purposes and in accordance with applicable privacy, records and National Law/Regulations requirements.
- Only approved service communication platforms, devices and accounts are to be used for official child and family communication unless management has authorised another method.
- Images, videos and digital information about children must be handled in accordance with the service Safe Use of Digital Technologies and Online Environments Policy, required authorisations and current National Law and Regulations.
- Information must be checked for accuracy before being sent. Where information is sent to the wrong recipient or a privacy breach occurs, the Nominated Supervisor/management must be informed promptly and the relevant response process followed.

IMPORTANT INFORMATION THAT MUST BE COMMUNICATED

- Incidents, injury, trauma or illness affecting a child must be communicated to families within the required timeframe and documented as required.
- Information about the educational program must be available to families, and information about their child's participation in the program must be provided on request as required by the National Regulations.
- Required policies and procedures must be accessible, and families must be notified of prescribed policy changes in accordance with Regulation 172 where applicable.
- Prescribed service information must be displayed and kept current in accordance with the National Law and Regulations.
- Child protection concerns, allegations, reportable conduct, serious incidents and other prescribed matters must be communicated to relevant authorities within required timeframes. Internal communication must never delay mandatory reporting or regulatory notification.

RESPONSIBILITIES

Approved Provider / Management: maintain effective communication systems; ensure policies and required information are accessible; protect confidential information; support child-safe governance; ensure staff understand escalation and reporting pathways; and respond to significant communication, privacy or child-safety concerns.

Nominated Supervisor / Responsible Person: support respectful day-to-day communication; ensure critical information is handed over; respond to family and staff concerns; maintain confidentiality; and escalate safety, regulatory and child-protection matters promptly.

Educators, Staff, Students and Volunteers: communicate professionally; listen to children and families; maintain privacy; use approved communication channels; keep required records; and immediately report concerns affecting children's safety, rights or wellbeing.

Families: communicate respectfully; provide accurate and current information relevant to their child's care; advise the service of changes that may affect the child; and use appropriate service communication and complaints pathways.

STATUTORY LEGISLATION & CONSIDERATIONS

- Education and Care Services National Law (NSW), including the paramount consideration of children's safety, rights and best interests and relevant duties relating to child safety, records, prescribed information and notifications.
- Education and Care Services National Regulations, including Regulations 73, 75, 76, 86, 155, 157, 168, 171, 172, 173, 181, 182 and 183, as applicable.
- National Quality Standard: Quality Area 4 (Professionalism), Quality Area 5 (Relationships with children), Quality Area 6 (Collaborative partnerships with families and communities) and Quality Area 7 (Governance and leadership).
- Privacy Act 1988 (Cth) and Australian Privacy Principles, where applicable.

- Children and Young Persons (Care and Protection) Act 1998 (NSW) and Children's Guardian Act 2019 (NSW), where child protection or reportable conduct matters arise.

SOURCES

- ACECQA – Guide to the National Quality Framework, current 2026 edition.
- ACECQA – Quality Area 7: Governance and Leadership.
- ACECQA – My Time, Our Place: Framework for School Age Care in Australia V2.0, including collaborative partnerships, child and young person voice, agency and continuity across home, school, OOSH and community.
- NSW Early Learning Commission – Child Safety Reforms and current regulatory guidance.
- Cubby OOSH Philosophy and related privacy, complaints, interactions, child protection and digital technology policies.

7.02 Philosophy Policy

INTRODUCTION

Cubby OOSH's service philosophy expresses the values, beliefs and commitments that guide our school age care services. It provides a shared foundation for decisions, relationships, policies, programs and daily practice across before school care, after school care and vacation care. The philosophy recognises children and young people as capable, competent and active participants in their own lives, and reflects the importance of play, leisure, belonging, relationships, family partnerships, inclusion and connection with schools and communities.

The philosophy is intended to be a living document. It is developed and reviewed collaboratively with children and young people, families, educators, service leaders, management and, where appropriate, community partners. It must be evident in what we do, not simply displayed as a statement.

PURPOSE

- To ensure a clear statement of philosophy guides all aspects of Cubby OOSH operations and practice.
- To ensure the philosophy reflects the National Quality Framework, My Time, Our Place: Framework for School Age Care in Australia V2.0 and the current needs, views and experiences of the Cubby OOSH community.
- To provide a shared foundation for decision-making, educational programming, relationships, inclusion, child safety, governance and continuous improvement.
- To ensure children and young people, families and educators have meaningful opportunities to contribute to the development and review of the philosophy.

SCOPE

This policy applies to Cubby OOSH school age care services, including before school care, after school care and vacation care. It applies to the Approved Provider, Persons with Management or Control, Nominated Supervisors, Responsible Persons, Educational Leaders, educators, staff, volunteers and students. Families, children and young people and relevant community partners are invited to contribute to philosophy review and reflection.

OUR OOSH PHILOSOPHY IN PRACTICE

The Cubby OOSH philosophy will reflect and guide practice in the following areas:

Children and young people

- Children and young people are recognised as capable, competent individuals with rights, strengths, interests, ideas, identities and increasing independence.
- Their voices, choices and experiences are actively sought and considered in decisions that affect their OOSH experience.
- Children and young people are supported to experience belonging, agency, friendship, challenge, relaxation, fun and connection within a safe and inclusive environment.

Play, leisure and learning

- OOSH is a play- and leisure-based setting. Children and young people are provided with genuine opportunities to choose how they use their time, including active play, creative experiences, social connection, quiet time and relaxation.
- Educators act intentionally and responsively without unnecessarily recreating the structure or expectations of the school day.

- Programming and curriculum decisions are informed by My Time, Our Place V2.0, children and young people's interests and ideas, critical reflection and knowledge of the service community.

Relationships and wellbeing

- Relationships are warm, respectful, reciprocal and child safe. Educators listen to children and young people, communicate respectfully and protect their dignity and privacy.
- Behaviour guidance is based on connection, co-regulation, clear expectations, developmentally appropriate support and respect for individual circumstances rather than punishment, humiliation or coercion.
- Children and young people are supported to develop friendships, resolve conflict, take appropriate risks and build confidence and resilience.

Equity, inclusion and diversity

- Every child and young person has the right to participate and belong. Reasonable adjustments and individualised supports are considered according to need.
- Culture, language, family structure, identity, ability, neurodiversity and different ways of being and doing are respected and represented authentically.
- Aboriginal and Torres Strait Islander perspectives are embedded respectfully and meaningfully throughout practice, recognising the diversity of Aboriginal and Torres Strait Islander peoples, cultures and communities.

Families, schools and community

- Families are respected as important partners with valuable knowledge about their children and young people.
- Cubby OOSH values collaborative relationships with schools and community organisations while maintaining appropriate privacy, consent and professional boundaries.
- The service supports continuity between home, school, OOSH and the wider community while recognising OOSH as a distinct leisure-based environment.

Child safety, rights and best interests

- Children and young people have the right to feel safe, be heard, be respected and receive appropriate support when they raise a concern.
- Where decisions or actions affect a child, the child's safety, rights and best interests are the paramount consideration and prevail over competing adult, operational, reputational or financial interests.
- Children and young people's views and experiences are considered in decision-making where appropriate to their age, understanding, communication and circumstances.

Professional practice and continuous improvement

- Educators and leaders are expected to understand the philosophy and be able to explain how it influences their decisions and practice.
- Critical reflection, professional learning, family and child feedback, incidents, assessment and rating outcomes, research and changes to law or guidance may all inform review of the philosophy.
- The philosophy informs the Quality Improvement Plan or NSW Self-Assessment Working Document and supports ongoing improvement across all seven Quality Areas.

DEVELOPMENT AND REVIEW OF THE PHILOSOPHY

- The Approved Provider will ensure each service has a current statement of philosophy that is included in, or linked to, the service Quality Improvement Plan or NSW Self-Assessment Working Document in accordance with Regulation 55.

- The philosophy will be reviewed as part of the service's annual quality improvement review and earlier where significant changes to legislation, the service community, research, approved learning frameworks or service practice make review appropriate.
- Review will include meaningful opportunities for educators, children and young people and families to contribute. Consultation may occur through conversations, meetings, surveys, displays, children's forums, reflective activities, suggestion processes or other accessible methods.
- Children and young people will be consulted in age-appropriate ways. Their participation is voluntary and their views will not be tokenised or sought only to confirm an adult decision.
- Feedback will be considered rather than automatically adopted. Where competing views arise, the Approved Provider will make the final governance decision while ensuring legal obligations and the paramountcy of children's safety, rights and best interests are upheld.
- The reasons for significant changes should be documented through meeting minutes, reflection records, the QIP/Self-Assessment Working Document or another appropriate service record.

ACCESSIBILITY AND EMBEDDING

- The current philosophy will be readily accessible to educators, families, children and young people and the wider service community, including at the service and through other communication channels used by Cubby OOSH where appropriate.
- The philosophy will form part of educator induction and ongoing professional reflection.
- Educators will use the philosophy when planning and evaluating the educational program, reviewing policies and procedures, making operational decisions and reflecting on interactions and environments.
- Service leaders will use staff meetings, Educational Leader discussions, QIP/self-assessment work and practice reviews to test whether actual practice remains consistent with the philosophy.
- Where practice is inconsistent with the philosophy, the service will identify actions for improvement rather than treating the philosophy as an aspirational display only.

RESPONSIBILITIES

Approved Provider / Management

- ensure a current statement of philosophy is maintained and linked with the service's quality improvement processes;
- provide genuine opportunities for consultation and ensure significant feedback is considered;
- ensure the philosophy remains consistent with current law, the NQS and the approved learning framework; and
- ensure governance decisions reflect the philosophy and children's paramount rights and best interests where relevant.

Nominated Supervisor / Educational Leader

- support educators to understand, critically reflect on and implement the philosophy;
- connect the philosophy to MTOP V2.0, programming, relationships, child-safe practice and the QIP/Self-Assessment Working Document; and
- facilitate opportunities for children, families and educators to contribute to review.

Educators and staff

- demonstrate the philosophy through daily interactions, decisions and professional conduct;
- contribute to critical reflection and review; and

- support children and young people to understand and influence the values and practices that shape their OOSH experience.

STATUTORY LEGISLATION & CONSIDERATIONS

- Education and Care Services National Law (NSW), including the guiding principles of the National Quality Framework and current NSW paramount consideration requirements.
- Education and Care Services National Regulations: Regulation 31 (condition on service approval - Quality Improvement Plan), Regulation 55 (Quality Improvement Plans), Regulation 56 (review and revision of Quality Improvement Plans) and other applicable governance, policy and program requirements.
- National Quality Standard: Element 7.1.1 - Service philosophy and purpose; Quality Area 1 - Educational program and practice; Quality Area 5 - Relationships with children; Quality Area 6 - Collaborative partnerships with families and communities; and Quality Area 7 - Governance and leadership.
- My Time, Our Place: Framework for School Age Care in Australia V2.0.
- United Nations Convention on the Rights of the Child.
- Disability Discrimination Act 1992 (Cth) and applicable anti-discrimination legislation.

SOURCES

- ACECQA - Guide to the National Quality Framework, current 2026 edition.
- ACECQA - National Quality Standard, Element 7.1.1 Service philosophy and purpose.
- ACECQA - My Time, Our Place: Framework for School Age Care in Australia V2.0 and supporting information sheets.
- NSW Early Learning Commission - current child safety reforms and paramountcy guidance.
- Cubby OOSH Philosophy and related Educational Curriculum, Interactions and Relationships with Children, Partnerships with Families, Communication and Assessment and Rating policies.

7.03 Assessment & Rating Process Policy

INTRODUCTION

Cubby OOSH is committed to continuous improvement and to providing high-quality school age education and care across before school care, after school care and vacation care. Assessment and Rating is part of the National Quality Framework and considers service practice against the National Quality Standard (NQS) and relevant National Law and Regulations. Cubby OOSH will approach

Assessment and Rating as an opportunity to demonstrate everyday practice, reflect critically, identify strengths and improve outcomes for children rather than as a one-off compliance event.

PURPOSE

- Embed ongoing self-assessment and quality improvement across all Cubby OOSH services.
- Ensure each service maintains the quality improvement documentation required by the National Regulations and current NSW processes.
- Prepare for and participate openly and professionally in Assessment and Rating undertaken by the NSW Early Learning Commission.
- Ensure children, families, educators, schools and relevant community partners have meaningful opportunities to contribute to continuous improvement.
- Use Assessment and Rating findings, feedback, incidents, complaints and service data to strengthen practice and outcomes for children.

SCOPE

This policy applies to Cubby OOSH approved services operating before school care, after school care and vacation care, and to the Approved Provider, Nominated Supervisors, Responsible Persons, Area Managers, Educational Leaders, educators and other staff involved in governance, self-assessment, quality improvement and Assessment and Rating.

NATIONAL QUALITY STANDARD

Services are assessed against the seven quality areas of the National Quality Standard:

- Quality Area 1 - Educational program and practice
- Quality Area 2 - Children's health and safety
- Quality Area 3 - Physical environment
- Quality Area 4 - Staffing arrangements
- Quality Area 5 - Relationships with children
- Quality Area 6 - Collaborative partnerships with families and communities
- Quality Area 7 - Governance and leadership

For Cubby OOSH, My Time, Our Place: Framework for School Age Care in Australia V2.0 is the approved learning framework that informs school-age program and practice.

SELF-ASSESSMENT AND QUALITY IMPROVEMENT

- Each service will engage in ongoing, honest self-assessment against the NQS, National Law, National Regulations, service philosophy and current NSW requirements.
- Under Regulations 55 and 56, the Approved Provider must ensure a Quality Improvement Plan (QIP) is prepared for each service within three months of service approval and reviewed and revised at least annually and whenever directed by the Regulatory Authority.
- In NSW, services may use the NSW Self-Assessment and Quality Improvement Planning Portal, the NSW Self-Assessment Working Document, or another compliant QIP format. Use of the NSW portal is encouraged but is not mandatory.
- Where a NSW service maintains and submits its self-assessment information through the NSW process, it is not required to submit a separate QIP for Assessment and Rating where the Regulatory Authority accepts that documentation for this purpose.

- The self-assessment/QIP will be treated as a live continuous-improvement document. Cubby OOSH may review it more frequently than the annual legal minimum, including through regular service meetings, compliance reviews and critical reflection.
- The document will include the service philosophy, an assessment of service practice against the NQS and Regulations, identified strengths/key practices, and areas or goals for improvement as required by Regulation 55.
- The most current quality improvement information will be made available to the Regulatory Authority on request and maintained so it accurately reflects current service practice.

CHILDREN, FAMILIES AND COMMUNITY VOICE

- Children and young people will be supported to contribute to self-assessment in age-appropriate ways, including through conversations, surveys, meetings, program reflection, suggestions and observations of their experiences.
- Family feedback will be sought through practical and accessible methods and used as genuine evidence for reflection and improvement, not simply collected for Assessment and Rating.
- Where relevant, feedback from schools and community partners may inform quality improvement, particularly around transitions, inclusion, community engagement and safe arrival arrangements.
- Children and families will not be coached to provide particular responses to an Authorised Officer. Their participation will be voluntary, respectful and authentic.

PARAMOUNTCY AND CHILD SAFETY

Assessment, self-assessment and improvement decisions can directly affect children. Where this occurs, the safety, rights and best interests of children are the paramount consideration. Quality ratings, reputation, cost, convenience or the desire to present the service positively must never override a child-safety concern, reporting obligation or necessary improvement. Children's views will be considered where appropriate to their age, development and circumstances.

PREPARING FOR ASSESSMENT AND RATING

- Assessment and Rating readiness will be embedded in everyday service operation rather than created only after notice of a visit.
- Current NSW processes may use a risk-based approach, including full or partial assessments and, in some circumstances, assessment activity connected with compliance or serious incidents.
- NSW generally provides five business days notice for Assessment and Rating visits, although assessment activity connected with compliance issues may occur without notice and national guidance permits shorter notice depending on circumstances.
- The Regulatory Authority may request a service's self-assessment information or QIP at any time, including for monitoring and preparation for Assessment and Rating.
- Before a scheduled visit, the Nominated Supervisor and Area Manager will ensure current service information is accessible, staff understand the service philosophy and key practices, and any requested documents are supplied accurately and within required timeframes.
- Preparation must not involve staging practice, creating retrospective evidence, directing children or families what to say, or temporarily changing ordinary practice solely to influence the rating.

DURING AN ASSESSMENT AND RATING VISIT

- The Responsible Person will confirm the identity of the Authorised Officer and follow normal visitor and child-safe access procedures.
- Authorised Officers will be provided lawful access, information and reasonable assistance required to perform their functions.
- Educators will continue normal OOSH routines and prioritise active supervision, safe arrival, relationships, play and leisure, child choice and children's needs throughout the visit.
- Educators will answer questions openly and describe how practice operates in their service. Where an educator is unsure, they should say so and identify where the relevant policy, procedure or information can be located rather than guessing.
- No child will be required to speak with an Authorised Officer. Children's dignity, privacy, safety and right to continue participating in their OOSH experience will be respected.
- Operational responsibilities, ratios, adequate supervision and emergency preparedness remain unchanged during the visit.

EVIDENCE AND EXCEEDING PRACTICE

Authorised Officers gather evidence through observation, discussion and sighting documentation. Evidence should demonstrate what ordinarily occurs at the service. Cubby OOSH will not rely on large quantities of documentation where practice can be demonstrated more meaningfully through children's experiences, educator knowledge, service records and authentic reflection.

For a standard to be rated Exceeding NQS, all three Exceeding themes must be demonstrated at the standard level:

- Practice is embedded in service operations.
- Practice is informed by critical reflection.
- Practice is shaped by meaningful engagement with families and/or the community.

QUALITY RATINGS

- Significant Improvement Required - a significant risk to the safety, health or wellbeing of children exists and immediate regulatory action may occur.
- Working Towards National Quality Standard - one or more requirements of the NQS are not met.
- Meeting National Quality Standard - all relevant elements and regulatory requirements are met.
- Exceeding National Quality Standard - practice goes beyond Meeting NQS and demonstrates the Exceeding themes in accordance with the national rating methodology.
- Excellent - awarded by ACECQA following application by an eligible service that demonstrates exceptional education and care, sector leadership and commitment to continuous improvement.

Assessment frequency is risk-based. Cubby OOSH will not rely on fixed statements such as every one, two or three years between assessments.

DRAFT REPORT, FEEDBACK AND FINAL RATING

- Following assessment, the Approved Provider may receive a draft report and may provide focused feedback about factual inaccuracies or relevant evidence in accordance with the Regulatory Authority's current process and timeframes.
- Feedback will be accurate, specific and supported by relevant evidence. It will not be used to create retrospective practice that did not exist at the time of assessment.

- Current NSW processes may limit the amount or type of supporting evidence that can accompany draft-report feedback; the service will follow the instructions provided with the draft report.
- Once the final report is issued, the Approved Provider will review the findings and determine whether a review of ratings is appropriate within the applicable statutory timeframe.
- Final ratings and assessment findings will be communicated and displayed as required by law. The service will use the report to inform ongoing self-assessment and improvement rather than treating the process as complete once a rating is issued.

RESPONSIBILITIES

Approved Provider / Management

- Ensure each service has compliant and current self-assessment/QIP documentation.
- Provide resources, governance and oversight for continuous improvement.
- Respond to Regulatory Authority requests, reports and review opportunities within required timeframes.
- Ensure identified compliance or child-safety issues are acted on immediately and are not deferred for the sake of Assessment and Rating.

Nominated Supervisor / Responsible Person

- Lead an embedded culture of self-assessment, reflection and continuous improvement.
- Ensure educators, children and families have genuine opportunities to contribute.
- Keep service evidence current and representative of actual practice.
- Support staff during Assessment and Rating while maintaining normal supervision and service operation.
- Use findings and feedback to guide future improvement.

Educational Leader and Educators

- Contribute professional reflection and evidence of everyday practice, including MTOP V2.0 program and practice.
- Understand the service philosophy, policies and quality goals relevant to their role.
- Participate openly in discussions with Authorised Officers and provide accurate information.
- Prioritise children's safety, rights, wellbeing, agency and meaningful OOSH experiences throughout the process.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including Part 5 Assessment and Rating and current child-safety and paramount consideration requirements.
- Education and Care Services National Regulations, including Regulation 31 (condition on service approval - quality improvement plan), Regulation 55 (quality improvement plans), Regulation 56 (review and revision of quality improvement plans), Schedule 1 (National Quality Standard), and other Regulations relevant to the practices being assessed.
- National Quality Standard, including Element 7.2.1 Continuous improvement and all seven Quality Areas.
- My Time, Our Place: Framework for School Age Care in Australia V2.0.

SOURCES

- ACECQA - Guide to the National Quality Framework, current 2026 edition.

- ACECQA - Assessment and Rating Process and National Quality Standard Assessment and Rating Instrument.
- ACECQA - Self-assessment and Quality Improvement Planning; Element 7.2.1 Continuous Improvement.
- NSW Early Learning Commission - Assessment and Rating; Self-assessment for Quality Improvement; NSW Self-Assessment and Quality Improvement Planning Portal / Working Document.
- Cubby OOSH Philosophy, Quality Improvement Plan / NSW Self-Assessment documentation and related governance policies.

7.04 Security of Child Portfolios Policy

INTRODUCTION

Cubby OOSH recognises that children and young people have a right to privacy, dignity and safe handling of information about them. Portfolios and educational documentation may contain observations, reflections, photographs, videos, children's work, family information and other personal information. This information must be collected, accessed, used, stored, shared, retained and disposed of in a way that supports the educational program while protecting children from privacy, digital and child-safety risks.

PURPOSE

To provide clear OOSH-specific requirements for the secure management of children's portfolios and educational documentation, including digital records and images, while supporting meaningful school-age documentation under My Time, Our Place V2.0 and the National Quality Framework.

SCOPE

- Applies to all Cubby OOSH educators, nominated supervisors, responsible persons, management, students, volunteers and any person given authorised access to portfolio information.
- Applies to paper and electronic portfolios, observations, learning stories, reflections, children's work, photographs, videos and other documentation linked to an identifiable child.
- Works alongside Cubby OOSH privacy, records, educational program, child safe environment and safe use of digital technologies policies.

GUIDING PRINCIPLES

- Documentation must be purposeful and proportionate. The National Quality Framework does not require a set number of observations, photographs or portfolio entries for each school-age child.
- Children and young people are active participants in decisions about documentation that concerns them. Educators should seek and respect their views about being photographed, recorded or having work shared, taking account of age, maturity, understanding and family authorisations.
- Portfolio practices must protect privacy, dignity, safety and wellbeing. Images or information must never be created or used in a way that is humiliating, intrusive, unsafe or unrelated to legitimate education and care purposes.
- Where a portfolio or documentation decision affects a child's safety, rights or best interests, those interests are a paramount consideration.

IMPLEMENTATION

1. Creating meaningful OOSH portfolios and documentation

- Educators may use a range of documentation methods appropriate to school-age care, including observations, children's comments, project records, photos, displays, group reflections, creative work and program evaluations.
- Documentation should reflect children's strengths, interests, relationships, agency, play, leisure and participation and should inform ongoing program decisions.
- Photographs or videos are not required for every observation or experience. Educators should avoid interrupting children's play or leisure simply to create documentation.
- Children may contribute to, review and comment on their own documentation where appropriate. Their preferences about what is recorded or displayed should be respected wherever practicable.

2. Access, confidentiality and privacy

- Access to an individual child's portfolio is limited to authorised Cubby OOSH personnel who require access for their role, the child where appropriate, and the child's parent/guardian or other person lawfully authorised to receive the information.
- Families must not be provided access to another child's private information. Where group documentation contains several children, educators must consider consent, privacy and the appropriateness of sharing before providing copies or digital access.
- Portfolio information must not be discussed in public areas or with people who do not have a legitimate need to know.
- Paper records must be stored securely when not in use. Digital records must be held on approved, access-controlled service systems or platforms and protected by appropriate passwords and permissions.
- Access credentials must not be shared. Suspected unauthorised access, loss, disclosure or a privacy/data breach must be escalated immediately to management and managed under applicable privacy, child-safety and incident procedures.

3. Images, videos and digital devices

- From 27 February 2026, centre-based education and care services must comply with the National Law device restrictions and the stronger NSW requirements applying to devices capable of taking, storing or transmitting images or videos.
- Only service-supplied devices may be used by educators working directly with children to capture, store or transmit images or videos of children for portfolio or educational documentation purposes. Personal phones, personal tablets, personal cameras and image-capable personal smartwatches must not be used or possessed while working directly with children except where a lawful exemption applies.
- Service-supplied devices must be configured, secured and used in accordance with Cubby OOSH child-safety and digital technology policies. They must not be used for personal purposes.
- Images and videos must only be captured for a legitimate education and care purpose, in accordance with current family authorisations and the child's dignity and views. Content must not be copied to personal accounts, personal cloud storage, personal devices or unauthorised platforms.
- Digital images and portfolio content must be reviewed and securely deleted or disposed of when no longer required, subject to any applicable record-retention requirement.

4. Sharing portfolios with families

- Families are encouraged to engage with documentation about their child through approved Cubby OOSH communication and portfolio processes.
- Digital portfolio content or images may only be shared through an approved secure platform, account or other method authorised by Cubby OOSH. Password-protected links alone do not replace the need for appropriate access controls, authorisations and secure storage practices.
- Before sharing group images or documentation, educators must check relevant permissions and ensure information about other children is not inappropriately disclosed.
- Where a family requests access, correction or clarification of information, the request will be handled promptly and in accordance with applicable privacy and record-management requirements.

5. Retention, transfer and disposal

- Portfolios and educational documentation must be retained only for as long as required by applicable law, Cubby OOSH record-retention requirements or a legitimate service purpose.

- When a child leaves the service, portfolio material intended for the child/family may be provided through an approved secure method. Cubby OOSH must retain any records it is legally required to keep rather than transferring the only copy to the family.
- Paper and digital information that is no longer required must be securely destroyed or permanently deleted so it cannot be reconstructed or accessed.

6. Responsibilities

- The Approved Provider and management ensure appropriate systems, approved devices, permissions, policies and safeguards are in place.
- The Nominated Supervisor/Responsible Person supports implementation at service level, responds to concerns and ensures educators understand current privacy and digital-device requirements.
- Educators use professional judgement to create meaningful documentation while protecting each child's privacy, dignity, safety and agency.
- Families are expected to protect the privacy of other children when receiving approved group documentation and not redistribute images or information contrary to service expectations or permissions.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services) National Law (NSW) - including paramount consideration and Part 6A device requirements.
- Education and Care Services National Regulations (NSW) - including educational program/documentation, records and Regulation 168 safe use of digital technologies and online environments requirements.
- Education and Care Services (Supply, Authorisation and Use of Devices) Order 2026 (NSW).
- National Quality Standard - Quality Area 1 Educational Program and Practice; Quality Area 2 Children's Health and Safety; Quality Area 7 Governance and Leadership.
- Privacy Act 1988 (Cth) and Australian Privacy Principles, where applicable to Cubby OOSH.

SOURCES

- ACECQA - My Time, Our Place: Framework for School Age Care in Australia V2.0.
- ACECQA - Educational program documentation guidance for school age care.
- ACECQA - Using digital devices in centre-based education and care services (2026).
- NSW Early Learning Commission - Restriction on personal devices and child safety reforms (2026).
- Office of the Australian Information Commissioner - Australian Privacy Principles guidance.
- Cubby OOSH Philosophy and related educational program, privacy, records, child safe environment and digital technology policies.

7.05 Privacy & Confidentiality Policy

INTRODUCTION

For the collection and use of personal information, the principles expressed in the Federal Privacy Act 1988, form the basis of this policy. Cubby OOSH applies this policy to the collection, use and storage of confidential information. Cubby OOSH also adheres to the standards expressed in the National Privacy Principles and the Federal Health Records Act 2012.

PURPOSE

At Cubby OOSH we respect and promote the rights of the Team Members, Family's, Children within our service, and the right to privacy with any external agency and wider community. Our aim is to protect sensitive information as outlined within this policy. We ensure all Team Members, family members and visitors to the service abide by the Federal Privacy Act and Principles.

SCOPE

- Ensure that confidential information received by our centres is dealt with in accordance with the appropriate legislation.
- Ensure that all Centre permanent, casual and part-time team members, students, volunteers, visitors and management team recognise and adhere strictly to the policy.
- Ensure that all Centre personnel recognise that confidentiality principles apply to accident and incident reports, children's illnesses whether congenital or temporary, the administration of medicines and the requirements inclusive for children with additional needs and support.

IMPLEMENTATION

- Information collected by the Centre Director upon enrolment of a child, recruitment of staff, financial details, observations and program documents, incidents or accidents, etc., must be filed individually into secure, lockable storage facilities.
- The Centre Director and Licensee are the only people authorised to have access to the confidential information storage facility.
- Children's personal details such as birthdays, photographs, etc. may only be displayed by staff in a Centre after being given written permission by a parent or guardian.
- Upon request to the Centre Director, families and team members may access their stored confidential information in order, personally, to change details.

- Medicare numbers and other personal identifiers are used only in an emergency situation (e.g. when taking a child to the hospital) and, if possible, with the express permission of a parent/guardian.
- Confidential documents and records which involve Commonwealth or State Regulatory Authorities are stored in the secure facility for the periods required by law and are able to be accessed only by those with the appropriate authorisation.
- When team members create any records pertaining to individual children, references which might identify other children must be avoided.
- Information Team members may be privy to, must remain confidential. Under no circumstances, is gossip or confidential information to be shared with other Team Members in or outside the workplace, resulting in a breach to the Privacy ACT.
- Team members are not to pass confidential information on to any Third Party, other Company / Business, without Managements consent, and abiding to the Privacy Act.
- Team members must be diligent when handling any form of technology, ensuring confidential information is not left open for other parties to see, and all confidential access codes and passwords are to be kept in a safe and secure location.
- If team members are unsure of the need for confidentiality in any situation, they must consult the Centre Director.

STATUTORY LEGISLATION & CONSIDERATIONS

- Education and Care Services National Law Act 2010
  - Section 273 Duty of confidentiality
- Education and Care Services National Regulations
  - Regulation 168 Education and care service must have policies and procedures
  - Regulations 181 to 184
- National Quality Standards
  - Standard 4.2 Professionalism
  - Standard 7.1 Governance
- The Privacy Act 1988
- Australian Privacy Principles

SOURCES

- OAIC: Rights and Responsibility; Privacy ACT

7.06 Acceptance & Refusal of Authorisations Policy

INTRODUCTION

Cubby OOSH is required to obtain and manage authorisations for particular decisions and actions involving children. Authorisations help ensure that children only receive medication, leave the service, attend excursions or transportation, or receive medical treatment in accordance with the Education and Care Services National Law and Regulations and the child's current enrolment information.

PURPOSE

To provide a clear and consistent process for accepting, verifying, recording and, where necessary, refusing authorisations. Decisions must protect each child's safety, rights and best interests while supporting families to understand and meet authorisation requirements.

SCOPE

This policy applies to Cubby OOSH before school care, after school care and vacation care services, including the Approved Provider, Nominated Supervisors, Responsible Persons, educators, staff, volunteers, students, families and authorised nominees.

Authorisations may be required for:

- Administration of medication.
- Seeking medical treatment and transportation by ambulance.
- Children leaving the service premises or being collected by an authorised person.
- Excursions and regular outings.
- Regular transportation or other transportation provided or arranged by the service, where applicable.
- Other matters required by legislation, the child's enrolment record or a Cubby OOSH policy, including relevant permissions for images, digital media or specific activities.

PARAMOUNT CONSIDERATION

Where an authorisation decision affects a child's safety, rights or best interests, these considerations are paramount. Cubby OOSH will not act on an authorisation merely because it has been requested by an adult if doing so would be unlawful, unsafe, inconsistent with a court order, contrary to the child's enrolment information, or otherwise place the child at unacceptable risk.

ACCEPTING AN AUTHORISATION

An authorisation will be accepted when it is permitted by law and Cubby OOSH policy and contains the information required for the particular authorisation. Depending on the matter, this may include:

- The child's full name.
- The name of the parent, authorised nominee or other person permitted to give the authorisation.
- The specific action, activity, medication, collection arrangement, excursion or transportation being authorised.
- Relevant dates, times, dosage, destination, transport details or period of authorisation, as required.

- The authoriser's signature or other approved secure electronic authentication and the date the authorisation was given.
- Any additional information required by the National Regulations or the relevant Cubby OOSH policy.

Electronic authorisations may be accepted through Cubby OOSH's approved enrolment, booking or communication system where the identity of the authoriser can be reasonably verified and the authorisation can be retained as a service record.

REFUSING OR NOT ACTING ON AN AUTHORISATION

Cubby OOSH may refuse, delay or seek clarification of an authorisation when:

- It is incomplete, unclear, unsigned, out of date or cannot be verified.
- The person giving it is not legally permitted or recorded as authorised to give that type of consent.
- It conflicts with the child's current enrolment record, parenting order, court order or other lawful direction.
- It does not meet the National Regulations or the requirements of the relevant Cubby OOSH policy.
- The requested action would create an unacceptable risk to the child or other children.
- A person presenting to collect a child cannot provide satisfactory identification where required, is not authorised, or appears impaired or otherwise unable to safely care for the child.

Where practicable, educators will explain what is missing or why the authorisation cannot be accepted and provide the family with an opportunity to correct or update it. A child will not participate in an activity requiring authorisation until a valid authorisation is in place.

DOCUMENTING A REFUSAL

Significant refusals must be documented in the Refusal of Authorisation Record or relevant service record, including the request made, why it was refused, who made the decision, actions taken to protect the child and any communication with the family or Approved Provider.

SPECIFIC AUTHORISATION REQUIREMENTS

Medication

Medication will only be administered in accordance with Regulations 92-96 and Cubby OOSH's Medication Policy. The medication record must contain the required authorisation and administration details. Medication must be in its original container, within expiry and administered in accordance with the label or written medical instructions.

In an anaphylaxis or asthma emergency, medication may be administered without prior authorisation as permitted by Regulation 94. The parent and emergency services must be notified as soon as practicable. Other emergency medication or treatment will be managed in accordance with the National Regulations, the child's medical management plan and Cubby OOSH emergency procedures.

Medical treatment and ambulance

The child's enrolment record must include the required authorisation for the Approved Provider, Nominated Supervisor or educator to seek medical treatment from a registered medical practitioner, hospital or ambulance service and for transportation by ambulance. In an emergency, staff will act immediately to protect the child and will not delay urgent treatment while attempting to contact a parent.

Children leaving the service / collection

A child may only leave the education and care service in the circumstances permitted by Regulation 99, including with a parent or authorised nominee, in accordance with a valid written authorisation, as part of an authorised excursion or transportation arrangement, or because the child requires medical, hospital or ambulance care or another lawful emergency response. Educators must verify collection arrangements against current enrolment information and may request photo identification.

Excursions and regular outings

Written authorisation must meet Regulation 102 and include the prescribed excursion information. For a regular outing, an authorisation may cover the outing for the period permitted by the Regulations, provided the details remain current. If the circumstances materially change, a new risk assessment and/or authorisation will be obtained as required.

Transportation

Where Cubby OOSH provides or arranges transportation other than as part of an excursion, authorisations and records will meet the transportation requirements of the National Regulations, including Regulation 102D where applicable. Regular transportation authorisations will be retained in the child's enrolment record.

RESPONSIBILITIES

Approved Provider / Management

- Ensure this policy is current, accessible and implemented at each OOSH service.
- Ensure systems are in place to verify, retain and securely store authorisations and refusal records.
- Support Nominated Supervisors and Responsible Persons where an authorisation is complex, disputed or involves a child safety concern.
- Ensure related policies remain consistent with current National Law, National Regulations and NSW requirements.

Nominated Supervisor / Responsible Person

- Check that required authorisations are complete and given by a person permitted to do so.
- Ensure current authorised nominees, court orders, medical information and transportation permissions are accessible to educators who need them.
- Refuse or escalate authorisations that do not meet legal, policy or safety requirements and document significant refusals.
- Ensure changes provided by families are updated promptly in the service's approved system.

Educators

- Follow the child's current enrolment information and relevant authorisations before administering medication, releasing a child, or including a child in an excursion or transportation arrangement.
- Check identification when a collector is not known to the service or when otherwise required.
- Do not rely on informal messages from a child, sibling or unauthorised person as authority for collection or another regulated action.
- Immediately raise unclear, conflicting or unsafe requests with the Responsible Person.

Families / Authorised Nominees

- Provide accurate, complete and current authorisations and notify Cubby OOSH promptly of changes.
- Keep authorised nominee and emergency contact information current.
- Provide required medication, medical management information and excursion/transportation permissions within requested timeframes.
- Ensure authorised collectors understand that identification may be requested.

RECORDS, PRIVACY AND REVIEW

Authorisations form part of the child's service records and will be retained, stored and accessed in accordance with the National Regulations and Cubby OOSH privacy and records-management requirements. Information will only be shared with people who require it to safely perform their role or where disclosure is authorised or required by law.

This policy will be reviewed at least annually, following relevant legislative change, a serious incident or identified authorisation failure, or when service practice indicates improvement is required.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services) National Law (NSW) - including the paramount consideration of children's safety, rights and best interests.
- Education and Care Services National Regulations (NSW): Regulations 92-96 (medication), 99 (children leaving the service), 100-102 (excursions), 102B-102F (transportation), 160-161 (enrolment records and authorisations), 168(2)(m) (acceptance and refusal of authorisations), 170 (policies and procedures to be followed), 171 (policies and procedures to be kept available).
- National Quality Standard: Quality Area 2 - Children's Health and Safety; Quality Area 6 - Collaborative Partnerships with Families and Communities; Quality Area 7 - Governance and Leadership.

SOURCES

- ACECQA - Acceptance and refusal of authorisations: Policy and procedure guidelines (2026).
- ACECQA - Guide to the National Quality Framework (2026).
- NSW Legislation - Children (Education and Care Services) National Law (NSW).
- NSW Legislation - Education and Care Services National Regulations (NSW).
- My Time, Our Place: Framework for School Age Care in Australia V2.0.

7.07 Enrolment Procedure

INTRODUCTION

Enrolment and orientation are important transition points for children and families. Cubby OOSH will provide a welcoming, child-safe and transparent process that supports school-age children to feel known, included and secure before they commence before school care, after school care or vacation care. Enrolment information is used to support safe care, effective supervision, inclusion, communication with families and schools, and compliance with the National Quality Framework and Child Care Subsidy requirements.

PURPOSE

To ensure enrolment decisions and records are accurate, lawful, inclusive and child-centred; families understand Cubby OOSH requirements before care commences; and educators have the information they need to safely support each child.

SCOPE

This procedure applies to Cubby OOSH services providing before school care, after school care and vacation care. Cubby OOSH primarily provides care for children who are enrolled or registered at school, generally of primary-school age. Any enrolment of a child who is preschool age or under will only occur where the service can lawfully provide care and all applicable NSW requirements, including staffing ratios and service capability, can be met.

Availability and acceptance of enrolment

- Enrolment is subject to the service approval, approved capacity, available places, staffing arrangements, adequate supervision and the service being able to safely meet the child's needs.
- Cubby OOSH will not refuse enrolment solely because a child has disability, additional needs, medical needs, cultural or language needs. Reasonable adjustments, inclusion supports and available funding will be explored with the family where required.
- Where demand exceeds available places, Cubby OOSH may operate a transparent service waitlist or booking-priority process. The former Australian Government Child Care Benefit "Priority of Access Guidelines" are no longer a mandatory CCS requirement and will not be represented as current law.
- Children requiring protection or wellbeing support will be responded to in accordance with child protection obligations and may also be eligible for Additional Child Care Subsidy (ACCS) child wellbeing support.

Paramount consideration

Where an enrolment, booking, transition, inclusion or safety decision affects a child, the safety, rights and best interests of the child are a paramount consideration. Financial, operational or adult preferences must not override a child-safety requirement. Children's views will be considered in a manner appropriate to their age, maturity and communication needs.

IMPLEMENTATION

1. Enrolment and booking through OWNA

1. Families create an account through the OWNA platform and submit the required enrolment information and booking request.
2. Where a place is not immediately available, the child may be placed on the service waitlist in accordance with Cubby OOSH booking practices.

3. When a place is offered, families must complete all required enrolment information, authorisations and supporting documents before care commences, unless an emergency or lawful exception applies.
4. Any applicable enrolment fee, bond or advance payment is managed in accordance with Cubby OOSH fee terms. Fee arrangements do not displace child-safety or legal obligations.
5. Families must promptly advise Cubby OOSH of changes to contact details, authorised nominees, court orders, medical information, school arrangements or other information relevant to the child's safe care.

2. Information required for each child

The enrolment record will contain the information required by Regulations 160-162 and other information reasonably required for safe OOSH operations, including:

- child's full name, date of birth, address and relevant school details;
- details of each known parent and emergency contacts;
- authorised nominees and persons authorised for collection, medical treatment/medication, excursions and transportation where applicable;
- health information, including medical conditions, allergies, healthcare needs, medical management plans and risk minimisation plans where required;
- details of any court orders, parenting orders or other legal arrangements affecting access, collection or decision-making;
- information about disability, additional needs, communication, behaviour support, culture, language, interests, strengths and reasonable adjustments that will help the service support the child safely and respectfully; and
- Child Care Subsidy enrolment information where the family is claiming CCS.

3. Authorisations and collection arrangements

- Authorisations must meet the requirements of the National Regulations and Cubby OOSH Acceptance & Refusal of Authorisations Policy.
- Only persons properly authorised in the enrolment record, or otherwise authorised in accordance with Regulation 99, may collect a child.
- Photo identification may be requested where an educator does not know the collecting person. A copy of a driver licence is not routinely required merely to prove identity; only information reasonably necessary for the service purpose will be collected or retained.
- Court orders and parenting arrangements will be recorded and followed. Families must provide current documents and promptly advise of changes.

4. Medical conditions, health and inclusion

- Before attendance, families must provide relevant health information and any required medical management plan, medication authorisation, risk minimisation plan and communication plan.
- Critical medical, allergy, disability, communication and safety information will be communicated to educators who need it to safely care for the child, while maintaining confidentiality.
- Cubby OOSH will work with families and relevant professionals to plan reasonable adjustments and inclusion supports. Inclusion Support Program assistance may be explored where appropriate.
- For school-age OOSH enrolments, Cubby OOSH will not apply preschool "No Jab, No Play" enrolment documentation requirements as though they were an OOSH condition of enrolment. Immunisation information may still be relevant for health management and outbreak response where required by law or public health advice.

5. Child Care Subsidy (CCS)

- Families who wish to receive CCS are responsible for making and maintaining an eligible CCS claim with Services Australia and confirming the enrolment when required.

- Cubby OOSH will create and maintain the child's CCS enrolment and submit session information in accordance with Family Assistance Law and current Australian Government requirements.
- From 5 January 2026, eligible families receive at least 72 hours of subsidised care per fortnight under the 3 Day Guarantee; some families receive 100 hours depending on their circumstances. This is a subsidy entitlement and does not guarantee an available OOSH place.
- Families remain responsible for applicable gap fees and any charges not covered by CCS, subject to lawful exemptions or ACCS arrangements.

6. Orientation and first attendance

- Families will be given practical information about service hours, sign-in/out, bookings and absences, fees, collection arrangements, medical requirements, behaviour guidance, complaints, communication and relevant policies.
- Children will be welcomed and shown key areas, boundaries, routines, toilets, belongings/storage areas, emergency arrangements and who they can approach for help.
- Orientation will be flexible. A child may visit before commencement, use visual information or transition supports, or have a gradual introduction where this is practical and beneficial.
- Educators will actively seek the child's views about interests, friendships, comfort, routines and supports. OOSH is a leisure-based setting and orientation should support belonging, choice and agency rather than replicate the school day.
- Where appropriate and authorised, Cubby OOSH may liaise with the child's school or relevant support professionals to support safe arrival, transition and continuity of care.

7. Management and educator responsibilities

- Confirm the enrolment record is complete enough for safe attendance before the child commences.
- Ensure the child is included on required attendance, medical, risk, emergency and communication systems.
- Ensure educators are informed of information they reasonably need for the child's safety, health, inclusion and wellbeing before or at commencement.
- Do not require a fixed number of observations or automatically place every child into an "observation cycle" as a condition of enrolment. Educational documentation for school-age children will be managed under Cubby OOSH educational program procedures and MTOP V2.0.
- Ensure information is reviewed when changes are notified and families are encouraged to review enrolment details regularly and at least annually.
- Escalate incomplete, inconsistent or high-risk enrolment information to the Nominated Supervisor/Responsible Person before care proceeds where necessary.

8. Confidentiality, access and records

- Enrolment records will be stored securely in OWNA and/or approved service record systems with access limited to authorised persons who require the information for their role.
- Information will only be disclosed where permitted or required by the National Law and Regulations, privacy law, child protection law or another lawful authority, or with appropriate consent.
- Parents may access records relating to their child subject to legal restrictions, privacy obligations and the rights of other persons.
- Records will be retained, stored and disposed of in accordance with Regulations 177, 181 and 183 and Cubby OOSH record-management requirements.

9. Safe arrival and school transitions

- Enrolment and booking information must clearly identify the child's school, expected attendance and relevant arrival/departure arrangements.

- For after school care, unexplained non-arrival will be managed under the Safe Arrival of Children Policy, including timely checking of bookings/attendance and contact with the family and/or school as required.
- Families must notify Cubby OOSH of absences and booking changes as early as possible. Late notification can affect the service's ability to account for children safely.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services) National Law (NSW) - including the paramount consideration of children's safety, rights and best interests.
- Education and Care Services National Regulations - Regulations 4, 99, 102, 102D, 123, 158 (NSW), 160, 161, 162, 168, 177, 181 and 183, as applicable.
- National Quality Standard - Quality Area 2 (Children's health and safety), Quality Area 6 (Collaborative partnerships with families and communities) and Quality Area 7 (Governance and leadership).
- Family Assistance Law and Child Care Subsidy requirements.
- Privacy Act 1988 and Australian Privacy Principles, where applicable.
- NSW child protection and public health requirements, where applicable.

SOURCES

- ACECQA - Guide to the National Quality Framework and Quality Area 7 operational requirements.
- NSW Early Learning Commission - Children above preschool age at OOSH; preschool-age children at OOSH; NSW legislative requirements.
- Australian Government Department of Education - Child Care Subsidy and 3 Day Guarantee.
- Services Australia - Child Care Subsidy.
- My Time, Our Place: Framework for School Age Care in Australia V2.0.

7.08 Return to Care Following Illness & Infectious Disease Policy

PURPOSE

To provide a clear, fair and child-safe process for children returning to Cubby OOSH following illness, including COVID-19 and other infectious diseases. The service will follow current NSW Health advice, the National Quality Framework and any directions from public health or the Regulatory Authority, while ensuring the safety, rights and best interests of children are the paramount consideration.

SCOPE

This policy applies to Cubby OOSH before school care, after school care and vacation care services, and to enrolled children, families, educators, volunteers and management. It replaces the former pandemic-era return-to-care arrangements, including obsolete COVID-19 relief package and essential-worker priority rules.

GUIDING PRINCIPLES

- Children who are unwell should remain at home until they are well enough to comfortably participate in the OOSH program and meet any applicable exclusion requirements.
- Return-to-care decisions will be based on the child's current health, symptoms, applicable public health guidance and any individual medical advice—not on outdated pandemic priority categories.
- Families will be treated respectfully and consistently. A child will not be excluded for longer than required by current health guidance, legislation, a lawful direction or reasonable service health and safety requirements.
- Where a decision affects a child's attendance, safety, rights or wellbeing, the child's safety, rights and best interests will be the paramount consideration.

COVID-19 – CURRENT NSW POSITION

There is no general NSW legal requirement for a person who tests positive to COVID-19 to self-isolate. NSW Health strongly recommends that people stay home until symptoms have gone and take steps to protect others. For school-age children, NSW Health advises that children with COVID-19 should stay home from school until they are well again. Cubby OOSH will apply the same health-based approach to attendance at OOSH.

- A positive COVID-19 test alone does not create a fixed mandatory exclusion period unless a current public health direction or other lawful requirement applies.
- A child should not attend OOSH while unwell with fever, significant respiratory symptoms, vomiting/diarrhoea, marked fatigue or other symptoms that prevent safe and comfortable participation.
- A child may generally return when they are well again, symptoms have resolved or sufficiently improved, and any condition-specific exclusion period has been met.
- Families should notify the service when a child has an infectious disease so the service can manage exposure, confidentiality and notification obligations.

RETURN TO CARE PROCESS

Families will:

- Keep children at home when they are unwell and advise the service of relevant infectious disease diagnoses or symptoms as soon as practicable.
- Follow current NSW Health exclusion guidance and any advice provided by the child's treating health practitioner.
- Provide updated medical information, medical management plans or risk-minimisation information where relevant to the child's safe return.
- Advise the service if the child requires temporary adjustments or additional support on return.

The Nominated Supervisor/Responsible Person will:

- Consider the child's symptoms, ability to participate, current NSW Health guidance, known infectious disease risks and any relevant medical advice.
- Not require a medical clearance certificate as a routine condition of return unless it is reasonably necessary because of the child's circumstances, current public health advice, a lawful direction, or uncertainty about safe participation.
- Ensure decisions are individualised and are not discriminatory, punitive or based on obsolete COVID-19 rules.
- Communicate any exclusion or return decision clearly to the family, including the reason and what is required before return.
- Consult management or relevant health/public health authorities where the appropriate exclusion period or return requirements are unclear.

INFECTIOUS DISEASE NOTIFICATION & RESPONSE

- Where an infectious disease occurs at a centre-based service, the Approved Provider will ensure a parent or authorised emergency contact of each child is notified as soon as practicable, as required by Regulation 88.
- Notifications will protect the identity and confidential information of the affected child unless disclosure is authorised or required by law.
- The service will implement appropriate hygiene, cleaning, ventilation, hand hygiene and respiratory hygiene measures and follow current NSW Health/Public Health Unit advice.
- Where required, the service will notify the Regulatory Authority, Public Health Unit or other authority within the applicable timeframe.

IF A CHILD BECOMES UNWELL AT OOSH

- The child will be supported in a calm, supervised and comfortable area, with dignity and appropriate separation from others where practicable.
- A parent/guardian or authorised nominee will be contacted and asked to collect the child where the child is too unwell to participate safely or may pose an infectious risk to others.
- Emergency medical assistance will be sought immediately where symptoms are serious or rapidly worsening.
- Any incident, injury, trauma or illness record and family notification requirements will be completed in accordance with the National Regulations and Cubby OOSH policy.

CHILDREN WITH ADDITIONAL OR MEDICAL NEEDS

Some children may experience prolonged symptoms, post-viral fatigue or have medical conditions that increase their vulnerability to infectious disease. Cubby OOSH will work with the child, family, school and relevant professionals (where appropriate and authorised) to support safe participation and reasonable adjustments. A child will not be excluded solely because of disability or additional needs where safe participation can reasonably be supported.

RECORDS, PRIVACY & COMMUNICATION

- Health information will be collected, used, stored and disclosed only as necessary for the child's education, care, safety, legal compliance or as otherwise authorised.
- Families will receive clear information about outbreaks or infectious disease occurrences without identifying affected children.
- Attendance, illness and relevant communication records will be maintained in accordance with Cubby OOSH procedures and regulatory record-keeping requirements.

STATUTORY LEGISLATION & CONSIDERATIONS

- Education and Care Services National Law Act 2010 – including section 2A (safety, rights and best interests of children as the paramount consideration)
- Education and Care Services National Regulations – Regulations 85–88 (incident, injury, trauma, illness and infectious diseases), 103, 168, 170–173, 175 and relevant record-keeping provisions
- National Quality Standard – Quality Area 2: Children's Health and Safety; Quality Area 7: Governance and Leadership
- NSW Health – School exclusion periods and current COVID-19 advice
- Privacy Act 1988 and Australian Privacy Principles, where applicable

SOURCES

- ACECQA – Dealing with infectious diseases: Policy and procedure guidelines (March 2026)
- ACECQA – Guide to the National Quality Framework (current 2026 edition)
- NSW Health – School exclusion periods
- NSW Health – COVID-19 information and testing guidance

7.09 Waiting List Policy

INTRODUCTION

Cubby OOSH may maintain a waiting list where requests for before school care, after school care or vacation care exceed the places available at a service. Waiting lists will be managed fairly, transparently and consistently, while recognising service capacity, children's safety, inclusion and the individual circumstances of children and families.

PURPOSE

To provide a clear and equitable process for managing waiting lists and offering available OOSH places, while ensuring that children's safety, rights and best interests are a paramount consideration in decisions that affect them.

SCOPE

This policy applies to Cubby OOSH services, management, enrolment staff, Nominated Supervisors/Responsible Persons and families seeking a place in before school care, after school care or vacation care.

WAITING LIST PRINCIPLES

- There is no current Australian Government mandatory "Priority of Access" order that requires CCS-approved OOSH services to allocate vacancies according to the former priority categories. Cubby OOSH will therefore apply this policy and any current legal or funding requirements when allocating places.
- A family's eligibility for Child Care Subsidy (CCS), including the 3 Day Guarantee, does not guarantee that an OOSH place is available. A booking can only be offered where the service has capacity.
- Waiting list decisions will be made without unlawful discrimination and with regard to the Disability Discrimination Act 1992 and the Disability Standards for Education 2005, which apply to OOSH services from 1 August 2026.
- Children with disability or additional needs will not be refused or disadvantaged simply because they may require reasonable adjustments or additional support. The service will work with families to understand the child's needs and consider reasonable adjustments, inclusion support and safe participation.
- Where a decision affects a child, the child's safety, rights and best interests will be a paramount consideration. Operational, financial or convenience considerations must not override child safety or lawful obligations.

ALLOCATION OF AVAILABLE PLACES

When a vacancy becomes available, Cubby OOSH will consider the requested days/session, date of application and the service's ability to safely accommodate the booking. The following factors may also be considered where relevant:

- children who need wellbeing support or whose circumstances indicate an immediate child-safety or welfare concern;
- children already enrolled who require continuity of care or a change to existing booked days;

- siblings of children already attending the service, where this supports family continuity and does not displace a higher child-safety need;
- the child's school attendance and practical suitability of the service for safe arrival, collection or transport arrangements;
- reasonable adjustments, inclusion support and staffing arrangements required to enable safe and equitable participation; and
- the order in which complete waiting list requests were received where other relevant factors are equal.

These considerations are not an automatic ranking system. Each request will be considered on its circumstances, consistently with this policy and applicable law.

IMPLEMENTATION

- Families seeking a place will submit a waiting list or booking request through OWNA or another Cubby OOSH approved enrolment process.
- Families must provide accurate contact details, the service and session/s required, the child's school details and any information reasonably required to plan for the child's safety, medical needs, disability, additional needs or inclusion support.
- Families must advise Cubby OOSH as soon as practicable if their requested days, contact details or circumstances change.
- A waiting list application does not constitute an enrolment, confirmed booking or guarantee of care.
- When a suitable place becomes available, Cubby OOSH will contact the family and may set a reasonable timeframe for acceptance. If the offer is declined or not accepted within the stated timeframe, the place may be offered to another family.
- Before a booking is confirmed, all required enrolment information, authorisations, medical information and other required documentation must be completed in accordance with the Enrolment Procedure and related policies.
- The number of places offered must not exceed the service approval/capacity and must allow the service to meet applicable educator-to-child ratios, adequate supervision and all other safety requirements.
- Waiting list information will be stored securely and accessed only by authorised personnel. Personal information will be handled in accordance with privacy, confidentiality and record-management requirements.

COMMUNICATION AND REVIEW OF DECISIONS

- Families may contact Cubby OOSH for an update on their waiting list request. Placement timeframes cannot be guaranteed because vacancies depend on bookings and service capacity.
- Where a family raises a concern about a waiting list decision, the matter will be reviewed by management and may be addressed through the service Complaints and Grievance procedure.
- Waiting list practices will be reviewed when legislation, funding requirements, service capacity or operational arrangements change.

STATUTORY LEGISLATION & CONSIDERATIONS

- Education and Care Services National Law (NSW)
- Education and Care Services National Regulations (NSW)
- National Quality Standard – Quality Area 6: Collaborative partnerships with families and communities
- National Quality Standard – Quality Area 7: Governance and leadership
- Disability Discrimination Act 1992 (Cth)
- Disability Standards for Education 2005 (as applying to OOSH from 1 August 2026)
- Privacy Act 1988 (Cth) and Australian Privacy Principles, where applicable
- Family Assistance Law and current Child Care Subsidy requirements, where applicable

SOURCES

- ACECQA – National Quality Framework and 2026 National Quality Standard
- Australian Government Department of Education – Child Care Subsidy and 3 Day Guarantee
- Australian Government Department of Education – Disability Standards for Education and early childhood education and care
- Cubby OOSH 7.07 Enrolment Procedure

7.10 Arrival & Departure of Children Policy

INTRODUCTION

Cubby OOSH is committed to ensuring every child is safely accounted for when arriving at, attending and departing the service. Arrival and departure are high-risk transition points in outside school hours care, particularly when children travel between school and OOSH. Clear responsibility, accurate attendance records, effective communication and active supervision are essential to protect children's safety, rights and wellbeing.

PURPOSE

This policy establishes consistent OOSH procedures for arrivals, departures, school-to-OOSH transitions, authorised collection, absences, visitors, late collection and uncollected children. It supports compliance with the Education and Care Services National Law and Regulations and ensures the safety, rights and best interests of children are the paramount consideration in all decisions and actions.

SCOPE

This policy applies to Cubby OOSH before school care, after school care and vacation care services, including the Approved Provider, Nominated Supervisors, Responsible Persons, educators, staff, volunteers, students, children, families, authorised nominees and visitors.

PARAMOUNTCY OF CHILDREN

From 27 February 2026, the safety, rights and best interests of children must be the paramount consideration in all decisions and actions relating to education and care. Arrival and departure decisions must therefore prioritise the child above adult convenience, operational pressure, reputational concerns or financial interests. Where there is uncertainty about a child's safety, collection arrangements or whereabouts, educators must act conservatively, escalate promptly and follow child protection, emergency and regulatory reporting requirements where applicable.

IMPLEMENTATION

Arrival at Before School Care and Vacation Care

- Children must be brought into the service and transferred into the care of an educator in accordance with the service's established arrival arrangements. A child must be sighted and acknowledged by an educator before the person delivering the child leaves.

- The child's arrival must be recorded accurately in the approved attendance system, including the child's name and arrival time. If the parent or authorised nominee does not complete the record, the service will ensure the attendance record is completed accurately as required by the National Regulations.

- Families must communicate relevant information affecting the child's health, safety, wellbeing or care that day, including medication, injury, illness, changes to collection arrangements or significant wellbeing information.

• Educators will welcome children respectfully and in an age-appropriate way that recognises the increasing independence of school-age children while maintaining clear duty-of-care arrangements.

Safe Arrival from School to After School Care

Cubby OOSH will maintain Safe Arrival of Children procedures and a service-specific risk assessment for children travelling between school and OOSH. The risk assessment will be reviewed at least every 12 months and as soon as practicable after circumstances change.

• The service will document when responsibility for each child transfers from the school, family or other education/care service to Cubby OOSH.

• Educators will use current booking and attendance information to identify children expected to arrive at OOSH.

• Children will be accounted for at the agreed collection/transition point and again on arrival at OOSH using the service's approved roll and attendance procedures.

• If a booked child does not arrive as expected, educators must immediately follow the service's non-arrival procedure. This includes checking available absence information, contacting the family and school as appropriate, escalating to the Nominated Supervisor/Responsible Person and taking further action according to risk.

• A child who cannot be located must never be treated as a routine absence until their whereabouts and safety have been reasonably confirmed.

• Educator-to-child ratios must be maintained during school pick-ups and transitions. Staffing must also be sufficient for adequate supervision and the risks identified in the Safe Arrival risk assessment.

• Changes to usual school-to-OOSH arrangements must be clearly communicated, verified and recorded.

Children Absent from After School Care

• Families must notify Cubby OOSH as early as possible when a booked child will be absent, preferably before the school bell/collection time and through the service's approved communication or booking system.

• Where the service has not been notified and a booked child does not present for collection, educators will commence the non-arrival procedure immediately rather than waiting until the end of the collection period.

• Educators may contact the parent/guardian, authorised contacts and school to establish the child's whereabouts. If the child cannot be located or their safety cannot be confirmed, the matter must be escalated promptly and emergency services contacted where circumstances warrant it.

• Actions and communications relating to an unexplained non-arrival must be documented.

Departure and Collection

- A child may only leave the service in accordance with Regulation 99, including being given into the care of a parent, an authorised nominee named in the enrolment record, or another person authorised by the parent or authorised nominee, unless another lawful exception applies.
- The person collecting the child must ensure the child is signed out using the approved attendance system and the departure time is accurate.
- Where the collector is not known to educators, photo identification must be sighted and the person's authority verified before the child is released.
- Families must advise the service of changes to collection arrangements. Authorisations must comply with the Acceptance and Refusal of Authorisations Policy and be appropriately verified and recorded.
- Cubby OOSH will not release a child to an unauthorised person. If there is doubt about identity or authority, the child will remain in the care of the service while clarification is sought.
- Cubby OOSH's operational requirement is that collectors are 18 years or older unless an alternative arrangement has been expressly approved by the Approved Provider, is lawful, documented and assessed as safe.
- Children may leave the premises in an emergency, including for emergency medical treatment, in accordance with the National Regulations.

Parenting Orders, Court Orders and Restricted Access

- The service will follow current court orders, parenting orders and other lawful documents provided to the service and recorded in the child's enrolment information.
- A parent will not be denied access solely because of an informal request from another parent where the person otherwise has lawful authority. Management must be consulted where arrangements are disputed or unclear.
- Where a person attempts to remove a child contrary to a current order or without lawful authority, educators will prioritise the safety of the child and others, seek management assistance and contact Police where required.
- Educators are not expected to place themselves or children at physical risk by physically restraining an aggressive or unsafe person. Relevant details must be recorded and provided to Police where safe to do so.

Person Appearing Intoxicated, Drug-Affected or Otherwise Unsafe

- If an authorised collector appears unable to safely care for or transport the child, educators will raise the concern respectfully and seek an alternative authorised collector wherever possible.
- The child's safety and best interests are paramount. The service will consider its child protection obligations and may contact Police or other relevant authorities where there is an immediate or significant risk.

• Educators must not place themselves or other children at risk through physical confrontation. Observations, actions and notifications must be documented.

Visitors

• Visitors must follow the service's visitor, sign-in/sign-out, child safe environment and supervision procedures.

• Visitors must not be left alone with children unless lawfully permitted, appropriately authorised and compliant with applicable child safety requirements.

• Visitor access must not compromise the service's ability to account for children or maintain a child safe environment.

Late Collection and Uncollected Children

• Families must collect children by the service's advertised closing time and notify the service as soon as possible if delayed.

• Where a child remains after closing, the Responsible Person will attempt to contact the parent/guardian and authorised nominees or emergency contacts.

• The child will remain appropriately supervised and reassured. Staffing arrangements must continue to support the child's safety and adequate supervision.

• If no authorised person can be contacted within a reasonable period, or there are concerns for the child's safety or welfare, the Responsible Person will contact the Approved Provider/management and seek advice or assistance from NSW Police and/or the NSW Child Protection Helpline as appropriate.

• Educators will not transport an uncollected child in a private vehicle or leave the child at a Police station or other location unless specifically directed and lawfully arranged by the relevant authority.

• All contact attempts, advice received, actions taken and the eventual transfer of care must be documented.

• Any applicable late collection fee will be managed under the current fee schedule and family agreement. Financial considerations will never delay or override action necessary to protect a child.

Final Service Check

• At service closure, educators will complete the approved closing procedure and physically check all areas accessible to children, including indoor and outdoor spaces, toilets, storage/play areas and any other relevant locations.

• Attendance records will be reconciled to ensure every child who attended has been accounted for and has a recorded departure or lawful transfer of care.

Attendance Records and Record Keeping

• The Approved Provider will ensure an attendance record is kept in accordance with Regulation 158, recording each child's attendance and arrival and departure times.

- Records must be accurate, accessible when needed for emergencies and protected from unauthorised access.
- Incidents involving a missing, unaccounted-for, incorrectly released or uncollected child must be documented and assessed for notification to the NSW Early Learning Commission and other authorities within required timeframes.

RESPONSIBILITIES

Approved Provider / Management

- Ensure this policy and related Safe Arrival procedures are current, implemented and available.
- Ensure a Safe Arrival risk assessment is completed at least annually and whenever relevant circumstances change.
- Provide adequate staffing, systems and training to support safe transitions, attendance accounting and collection.
- Ensure serious incidents and other prescribed matters are notified to the NSW Early Learning Commission within applicable timeframes.

Nominated Supervisor / Responsible Person

- Implement service-specific arrival, departure, roll-call and non-arrival procedures.
- Ensure current authorised nominee, emergency contact, court order and medical information is accessible to relevant educators.
- Escalate unexplained absences, collection concerns and uncollected children promptly.
- Ensure records and incident documentation are complete and accurate.

Educators and Staff

- Actively supervise children during arrival, departure and transition periods.
- Accurately account for children and immediately respond when a child is not where expected.
- Verify collectors and follow authorisation requirements.
- Communicate concerns immediately to the Responsible Person and document actions taken.

Families

- Keep enrolment, authorised nominee, emergency contact and court-order information current.
- Notify the service promptly of absences and changes to collection arrangements.
- Use the approved sign-in/sign-out process and ensure authorised collectors understand service requirements.
- Collect children by closing time or notify the service promptly if delayed.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including the paramount consideration of children's safety, rights and best interests.
- Education and Care Services National Regulations (NSW), including Regulations 99, 102AA, 102AAB, 102AAC, 158, 160-161, 168, 176, 177, 181 and 183, as applicable.
- National Quality Standard - Quality Area 2: Children's Health and Safety, including child-safe practice and adequate supervision.
- National Quality Standard - Quality Area 7: Governance and Leadership.
- My Time, Our Place: Framework for School Age Care in Australia V2.0.
- NSW child protection and reportable conduct requirements.

SOURCES

- ACECQA - Guide to the National Quality Framework (current 2026 edition).
- ACECQA - Safe Arrival of Children information sheet and policy/procedure guideline.
- NSW Early Learning Commission - Children above preschool age at OOSH; staff ratios and adequate supervision; notifications and reporting.
- NSW Early Learning Commission - 2026 child safety and paramountcy guidance.

7.11 Fee and Debt Management Policy

INTRODUCTION

Cubby OOSH relies on the timely and accurate payment of fees to support sustainable, high-quality before school care, after school care and vacation care. Families are entitled to clear information about fees, billing, Child Care Subsidy (CCS), payment arrangements and debt management. Cubby OOSH will administer fees consistently, transparently and respectfully, while recognising that financial hardship can arise unexpectedly.

PURPOSE

This policy sets out Cubby OOSH requirements for charging and collecting fees, CCS administration, account statements, changes to fees, late collection charges, overdue accounts, payment plans, withdrawal and termination of enrolment. It aims to ensure families understand their financial responsibilities and that debt recovery is fair, documented and consistent with applicable law.

SCOPE

This policy applies to all Cubby OOSH families and to staff involved in enrolment, bookings, billing, accounts, CCS administration and management. Current fee amounts, enrolment charges, notice periods, direct debit charges and other service-specific amounts are set out in the current Fee Schedule, enrolment terms and/or Complying Written Arrangement (CWA), rather than being fixed permanently in this policy.

PARAMOUNTCY AND CHILD-FOCUSED DECISION MAKING

Fee and debt matters are primarily financial and administrative; however, where a decision may affect a child's access to care, safety, rights or wellbeing, the safety, rights and best interests of the child must be the paramount consideration. A child must not be shamed, singled out, questioned about family debt or used to communicate account concerns. Financial discussions will occur privately with the responsible adult. Child safety, child protection and emergency obligations will never be delayed or overridden because an account is overdue.

FEES AND ENROLMENT ARRANGEMENTS

- Families will be informed of the current fees and relevant charges before or at enrolment and whenever fees change.
- Any enrolment fee, holding deposit, payment-in-advance requirement or other charge will be applied only where it forms part of Cubby OOSH's current published fee arrangements and the family's enrolment/CWA terms.
- Families are responsible for ensuring their booking and enrolment details are accurate and for paying the amount for which they are liable after any CCS or other lawful fee reduction has been applied.
- Fees may apply to booked sessions when a child is absent, subject to the family's booking arrangement, CCS rules and the current Fee Schedule.
- Vacation care and casual bookings may have separate booking, cancellation and payment conditions which will be communicated before bookings are confirmed.

CHILD CARE SUBSIDY (CCS)

- CCS is administered under Commonwealth Family Assistance Law. Eligibility and entitlement are determined by Services Australia, not Cubby OOSH.
- Cubby OOSH will submit accurate session reports for each child as required, including actual attendance information, absences, fees and relevant discounts or third-party contributions.
- CCS payments received by Cubby OOSH will be passed on to eligible families as a fee reduction in accordance with Family Assistance Law.
- Families receiving CCS are generally required to make a co-contribution by paying the gap fee. Cubby OOSH will take reasonable steps to collect CCS gap fees electronically, subject to lawful exceptions.
- Families must notify Services Australia and Cubby OOSH of relevant changes that may affect their enrolment or CCS. Any CCS adjustment, recovery, withholding or cessation may change the amount payable by the family.
- Cubby OOSH cannot guarantee a family's CCS entitlement and is not responsible for decisions made by Services Australia. Families remain responsible for amounts not covered by CCS.

STATEMENTS, INVOICES AND BILLING

- Cubby OOSH will provide families with account information through its approved billing/management system and will issue CCS statements of entitlement at least fortnightly where required by Family Assistance Law.
- Statements of entitlement will relate to care that has already occurred and will include the information required by Family Assistance Law, including relevant sessions, attendance/absence information, fees, CCS reductions and applicable discounts.
- Invoices, direct debit timing and payment cycles will be managed in accordance with the current Cubby OOSH billing schedule and family agreement.
- Families should review statements promptly and contact the Accounts/Support Office if they believe an account is incorrect. Cubby OOSH will investigate genuine billing disputes and correct errors where identified.
- Families must maintain sufficient funds and current payment details for agreed direct debit arrangements. Any third-party payment processing or dishonour fee will be disclosed in the applicable payment terms.

DISCOUNTS, THIRD-PARTY PAYMENTS AND REFUNDS

- Any discount, refund, third-party payment or provider contribution will be recorded and reported in accordance with current Family Assistance Law.
- Where a discount reduces the actual session fee, Cubby OOSH will report the correct reduced fee where required. Prescribed discounts will be managed and reported in accordance with the specific CCS rules applying to those discounts.
- Refunds or account credits will be processed following verification of the account and any CCS implications.

LATE COLLECTION FEES

- Families must collect children by the service closing time. The current late collection fee, if applicable, will be stated in the Fee Schedule or family agreement.

- Late collection charges are separate from the service's child safety response. Educators will continue to supervise and care for an uncollected child and follow the Arrival & Departure of Children Policy regardless of a family's account status.
- Repeated late collection may also be managed as an operational and child wellbeing matter in addition to any applicable fee.

Late collection fees are charged at $20 for every 15 minutes, or part thereof, after the service closing time, where this amount is included in the current Fee Schedule and family enrolment agreement. For example, collection 5 minutes after closing incurs $20; collection 20 minutes after closing incurs $40.

Each late collection will be documented using the Late Collection Record & Fee Acknowledgement Form, including the scheduled closing time, actual collection time, fee calculation, parent/guardian communication and any relevant circumstances. A copy will be provided to the family or made available on request.

Where late collection occurs repeatedly, Management may meet with the family, issue a written warning and agree on strategies to support collection by closing time. Continued late collection after written warning may result in suspension of future bookings or termination of enrolment, following individual review, reasonable written notice and consideration of the child's safety, rights, wellbeing and any exceptional family circumstances. Decisions will be consistent with the enrolment agreement and applicable law.

CHANGES TO FEES OR FEE-COLLECTION ARRANGEMENTS

Cubby OOSH may review fees and billing arrangements to support the sustainable operation of the service. Families will be given the notice required by law and their enrolment agreement. Where a change to a required policy or procedure affects the way fees are charged or collected, families will be notified at least 14 days before the change takes effect, unless an exception under the National Regulations applies. Cubby OOSH may provide a longer notice period as a matter of service practice.

OVERDUE ACCOUNTS AND DEBT MANAGEMENT

- Families experiencing difficulty paying fees are encouraged to contact the Accounts/Support Office as early as possible. Discussions will be respectful, confidential and focused on resolving the account.
- Cubby OOSH may issue reminders, statements and formal notices when an account becomes overdue.
- Where appropriate, Cubby OOSH may agree to a payment plan. Any arrangement must be documented, realistic and reviewed if payments are missed.
- Before suspending or terminating future bookings because of debt, Cubby OOSH will provide reasonable written notice, explain the amount outstanding and available options, and consider any relevant child safety, vulnerability or hardship factors.
- Where a child may be experiencing vulnerability or there are child protection concerns, management will consider whether additional support pathways, including ACCS (child wellbeing) processes where applicable, should be explored separately from ordinary debt recovery.
- If an account remains unpaid and no satisfactory arrangement is maintained, Cubby OOSH may suspend future bookings, terminate enrolment and/or refer the debt for lawful recovery in accordance with the family agreement and applicable consumer law.
- Any debt recovery action will relate to the responsible adult. Children will not be involved in debt discussions or treated adversely because of family financial circumstances.

WITHDRAWAL AND TERMINATION OF ENROLMENT

- Families wishing to withdraw a child must provide the notice required under the current enrolment terms/CWA. Cubby OOSH will clearly communicate the applicable notice period.
- Fees may remain payable during a notice period where this forms part of the family's agreed booking terms, subject to Family Assistance Law and consumer law.
- Families should be aware that CCS rules may affect subsidy for absences before a child's first physical attendance or after their last physical attendance. Cubby OOSH will report sessions accurately and will not guarantee CCS for any notice-period absence.
- If Cubby OOSH terminates an enrolment because of unpaid fees, the family will receive written confirmation of the effective date, outstanding balance and any ongoing lawful payment obligations.
- Re-enrolment or restoration of bookings after withdrawal, suspension or termination is subject to availability and the service's current enrolment and waiting-list arrangements.

FINANCIAL HARDSHIP AND VULNERABILITY

- Cubby OOSH recognises that families may experience temporary or ongoing financial hardship. Families may request a confidential discussion with the Accounts/Support Office about payment options.
- Where relevant, families may be directed to Services Australia or other appropriate support services for information about CCS, Additional Child Care Subsidy (ACCS) or other assistance.
- Financial hardship does not remove lawful fee liability, but Cubby OOSH may exercise reasonable discretion about payment arrangements and debt recovery while maintaining consistent and sustainable service operations.

PRIVACY AND RECORD KEEPING

- Financial, CCS and debt information will be treated as confidential and accessed only by authorised personnel who require it for their role.
- Cubby OOSH will maintain records required under the National Law and Regulations, Family Assistance Law, taxation/accounting obligations and the service's records and privacy policies.
- Account information will not be discussed with children or disclosed to other families.

NON-NOTIFICATION OF ABSENCE FEE

Families are responsible for notifying Cubby OOSH when their child will not be attending a booked session. For After School Care, families should notify the service before the school bell/collection time wherever reasonably possible, using the approved Cubby OOSH booking or communication system.

Where a child is booked to attend and the family has not notified Cubby OOSH that the child will be absent, a $10.00 Non-Notification of Absence Fee per child, per occurrence will be charged.

This fee reflects the additional safety and administrative processes required when a booked child does not arrive as expected. Educators cannot assume that a child is simply absent. They must immediately commence the service's safe-arrival/non-arrival procedure to establish the child's whereabouts and confirm that the child is safe.

- This may require educators to check the service roll, booking and available absence information.
- Educators may need to contact the school, parent/guardian and authorised contacts to establish where the child is.

- The Nominated Supervisor/Responsible Person may need to become involved and the matter may require further escalation where the child's whereabouts cannot be confirmed.
- These actions take educators away from other duties and require additional staff time while the service continues to maintain adequate supervision of children already in care.
- Prompt absence notification is therefore a child-safety requirement as well as an administrative requirement. It enables educators to distinguish a known absence from a child who may be missing or unaccounted for.

The fee will not apply where Cubby OOSH was notified of the absence before the relevant collection/roll-call process commenced, or where Management determines that exceptional circumstances reasonably prevented the family from notifying the service.

Repeated non-notification may result in Management contacting the family to reinforce the service's Safe Arrival of Children procedures and the family's responsibility to notify Cubby OOSH of absences.

As this fee affects the fees charged to families, Cubby OOSH will provide families with at least 14 days' notice before the Non-Notification of Absence Fee takes effect, in accordance with Regulation 172. The fee will also be reflected in the current Fee Schedule and/or relevant family enrolment information.

RESPONSIBILITIES

Approved Provider / Management

- Approve the fee structure and ensure billing and debt-management systems comply with applicable law.
- Ensure required policies, family agreements and fee information are current and accessible.
- Oversee significant debt, hardship, suspension/termination and legal recovery decisions.

Accounts / Support Office

- Administer invoices, direct debits, account statements, CCS adjustments and debt follow-up.
- Respond to billing enquiries and document payment arrangements.
- Escalate disputed, high-risk or persistent debts to management.

Nominated Supervisor / Responsible Person

- Refer fee and account enquiries to the appropriate Accounts/Support personnel rather than discussing sensitive financial matters in front of children.
- Communicate operational information relevant to bookings, attendance and late collection accurately.
- Escalate any child safety or wellbeing concern that becomes apparent in connection with fee or attendance issues.

Families

- Read and comply with the current fee schedule, enrolment/CWA and payment arrangements.
- Keep payment and CCS-related information current and review account statements.
- Contact Cubby OOSH promptly if an account appears incorrect or payment difficulty arises.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including the paramount consideration of children's safety, rights and best interests where decisions affect children.
- Education and Care Services National Regulations (NSW), including Regulations 168, 170, 171 and 172 as applicable to required policies, accessibility, implementation and notification of changes.
- National Quality Standard - Quality Area 7: Governance and Leadership.
- Family Assistance Law governing Child Care Subsidy and Additional Child Care Subsidy, including enrolment, session reporting, fee reporting, gap-fee collection and statements of entitlement.
- Australian Consumer Law, including requirements relevant to transparent fees, representations and fair contract terms.
- Privacy Act 1988 (Cth) and Australian Privacy Principles where applicable.

SOURCES

- ACECQA - Guide to the National Quality Framework (current 2026 edition).
- ACECQA - Payment of service fees and provision of a statement of fees charged by the service policy and procedure guidelines.
- Australian Government Department of Education - Child Care Provider Handbook (2026).
- Australian Government Department of Education - How to manage payments and fees; session reports; statements of entitlement; discounts and third-party payments.
- Services Australia - Child Care Subsidy information for families and providers.

7.12 Child Care Subsidy Policy

INTRODUCTION

Cubby OOSH is an approved Outside School Hours Care provider that administers Child Care Subsidy (CCS) and, where applicable, Additional Child Care Subsidy (ACCS) under Commonwealth Family Assistance Law. CCS is generally paid to the approved provider and passed on to eligible families as a reduction in their child care fees. Eligibility and entitlement are determined by Services Australia, not by Cubby OOSH.

PURPOSE

- Provide families with clear and accurate information about how CCS operates at Cubby OOSH.
- Ensure enrolments, care arrangements, attendance, absences, fees and session reports are recorded and submitted accurately.
- Ensure CCS and ACCS are administered in accordance with Family Assistance Law and current Australian Government requirements.
- Protect the confidentiality, integrity and security of CCS-related information and records.
- Ensure governance, audit and fraud-control processes support accurate use of public funds.

SCOPE

This policy applies to Cubby OOSH before school care, after school care and vacation care services and to the Approved Provider, persons with management or control, persons responsible for day-to-day operation, authorised CCS personnel, accounts/support staff, Nominated Supervisors and families where relevant.

IMPLEMENTATION

CCS Eligibility and Family Responsibilities

- Families are responsible for making and maintaining their CCS claim with Services Australia and for providing accurate information required to establish the child's enrolment and CCS entitlement.
- CCS is not automatically available to every child attending OOSH. A family must meet Commonwealth eligibility requirements and have an active CCS enrolment for subsidy to be applied.
- Families must provide the information reasonably required for CCS administration, which may include the Customer Reference Number (CRN), name and date of birth of the child and the individual claiming CCS.
- Families must notify Services Australia and Cubby OOSH of relevant changes that may affect their CCS, enrolment or care arrangement.
- Families remain responsible for fees not covered by CCS, including any gap fee and amounts arising where CCS is reduced, withheld, reconciled or not payable.

3 Day Guarantee - From 5 January 2026

From 5 January 2026, the CCS activity test was replaced by the 3 Day Guarantee. All CCS-eligible families can receive at least 72 hours of subsidised care per fortnight for each eligible child, regardless of recognised participation hours.

- Families may receive 100 hours of subsidised care per fortnight in specified circumstances, including where they care for an Aboriginal and/or Torres Strait Islander child, have more than 48 hours of recognised participation per fortnight, have an approved exemption or exceptional circumstances, or receive specified types of ACCS.
- The 3 Day Guarantee relates to subsidised hours only. It does not guarantee a place, booking or particular session at Cubby OOSH. Places remain subject to enrolment, service capacity, staffing, bookings and the service's Waiting List and Enrolment procedures.
- Families who are not already receiving CCS must make a claim and be assessed as eligible before subsidised hours can apply.

Care Arrangements and Complying Written Arrangement

- Before CCS can be properly administered, Cubby OOSH and the family must have an agreed care arrangement. A Complying Written Arrangement (CWA) is the usual arrangement for families receiving CCS.
- The CWA will contain the information required under Family Assistance Law, including the parties to the arrangement, child details, commencement date, care pattern or session details and fee information as applicable.
- Changes to ongoing care arrangements, fees or sessions will be updated and communicated in accordance with current CCS requirements and Cubby OOSH enrolment/fee procedures.
- Families may be required to confirm enrolment details through Services Australia/MyGov where required by the CCS system.

Session Reports and Attendance

- Cubby OOSH will submit accurate session reports for care provided, using the approved CCS system and/or approved third-party child care software integrated with the Child Care Subsidy System.
- Session reports will reflect the actual session of care, attendance/absence information, fees charged and other prescribed information.
- Attendance records must accurately record children's arrival and departure in accordance with the Education and Care Services National Regulations and Cubby OOSH attendance procedures.
- Authorised staff will check attendance and booking information and resolve discrepancies before or after submission as required. Incorrect session reports will be varied or withdrawn within applicable CCS timeframes.
- CCS records must not be altered, created or submitted to obtain a subsidy to which a family or service is not entitled.

Absences

- CCS may be payable for up to 42 allowable absence days per child in each financial year, subject to current Family Assistance Law and the family having CCS entitlement.
- Additional absence days may be available in prescribed circumstances and may require supporting evidence.
- An absence can only be reported for CCS where the child was enrolled for the session and the family was charged a gap fee for that session, subject to applicable exceptions and current Commonwealth rules.

- CCS generally cannot be claimed for absences before a child has physically attended care under a new enrolment or after the child's last physical attendance, except where a lawful exception applies.
- Families should notify Cubby OOSH promptly when a child will be absent. OOSH safe-arrival and non-arrival procedures operate separately from CCS absence reporting requirements.

Fees, Gap Fees and CCS Payments

- Services Australia generally pays CCS to Cubby OOSH on behalf of eligible families. Cubby OOSH will pass the subsidy on as a fee reduction on the family account.
- Families are generally required to make a co-contribution by paying the gap fee, being the difference between the session fee and CCS amount, unless a lawful exception applies.
- Cubby OOSH will take all reasonable steps to collect CCS gap fees electronically in accordance with Family Assistance Law.
- Cubby OOSH will report the full session fee and any required discount or third-party payment information accurately. Prescribed discounts will be recorded and reported as required.
- Fee collection, overdue accounts, payment plans and service-specific charges are managed under the Fee and Debt Management Policy and current Fee Schedule.

Statements of Entitlement

Cubby OOSH will provide families with Statements of Entitlement at least fortnightly where required by Family Assistance Law. Statements will contain prescribed information about sessions of care, fees and CCS applied. Families should review statements and promptly raise any discrepancy with the Support/Accounts team.

Additional Child Care Subsidy (ACCS)

ACCS provides additional fee assistance in specified circumstances. Depending on the ACCS type, Services Australia or an approved provider may be responsible for making or supporting an application, determination or certificate. Cubby OOSH will follow current Commonwealth requirements for ACCS child wellbeing, grandparent, temporary financial hardship and transition to work.

- Where there are concerns that a child is at risk of serious abuse or neglect, Cubby OOSH will consider ACCS child wellbeing alongside its separate mandatory reporting, child protection and child-safe obligations.
- CCS/ACCS administration must never delay action required to protect a child. The safety, rights and best interests of children remain paramount where a CCS or ACCS decision intersects with a child's safety or wellbeing.
- Relevant evidence, certificates, determinations and records will be retained securely for the period required by Family Assistance Law.

Specified Personnel, Fit and Proper Requirements and Background Checks

- Cubby OOSH will identify specified personnel required under Family Assistance Law, including persons with management or control of the provider and persons responsible for day-to-day operation of an approved service.
- The Approved Provider will ensure specified personnel satisfy current fit and proper person requirements and that required background checks are completed, current where required, recorded and produced to the Department when lawfully requested.

- Cubby OOSH will notify the Australian Government Department of Education of changes to specified personnel and other prescribed circumstances within required timeframes.
- Access to CCS administration systems, including PRODA and third-party software, will be limited to authorised personnel with appropriate access permissions.

Data Accuracy, Compliance, Fraud and Audit

- Cubby OOSH will maintain processes to check enrolment, attendance, absence, fee and session-report data for accuracy and completeness.
- CCS claims and session reports will be based on genuine care arrangements and actual service records. Deliberate false or misleading claims, records or statements are prohibited.
- Potential errors, overpayments, non-compliance or suspected fraud will be escalated to management and corrected or reported to the Department where required.
- The service will cooperate with lawful audits, compliance checks and requests for records from the Australian Government Department of Education and Services Australia.
- Authorised personnel will undertake training and keep current with material changes to Family Assistance Law and the Child Care Provider Handbook.

Privacy, Security and Record Keeping

- CCS-related personal information will be collected, used, stored and disclosed only for lawful and reasonably necessary purposes.
- Records will be maintained in approved secure systems with access restricted to authorised personnel. Personal information must not be stored on unauthorised personal devices.
- Cubby OOSH will retain CCS records and supporting evidence for the periods required under Family Assistance Law and will also comply with applicable Education and Care Services National Law/Regulations record-keeping requirements.
- Families may request access to records relating to them or their child, subject to privacy, legal and child-safety restrictions. Requests do not need to be made through a solicitor unless required by the circumstances.
- CCS information will only be disclosed to government agencies, families, authorised representatives or other persons where authorised or required by law.

Complaints, Disputes and Corrections

- Families may contact Cubby OOSH Support/Accounts regarding CCS, fees, enrolment or session-report concerns. The service will investigate and correct service-generated errors where identified.
- Questions about a family's CCS eligibility, subsidy percentage, subsidised hours, withholding or entitlement decisions may need to be directed to Services Australia because Cubby OOSH cannot determine or override those decisions.
- Complaints will be handled in accordance with the Cubby OOSH Complaints and Grievance Procedures and applicable CCS requirements.

RESPONSIBILITIES

Approved Provider / Management

- Maintain provider and service approval for CCS and ensure compliance with Family Assistance Law.
- Ensure specified personnel, PRODA access, system permissions, governance and audit controls are current.
- Ensure accurate reporting, record keeping, notifications and correction of identified errors or non-compliance.

Support / Accounts / Authorised CCS Personnel

- Maintain accurate CCS enrolment, fee, attendance and session-report information.
- Assist families with service-level CCS processes without representing that Cubby OOSH determines government entitlement.
- Protect CCS information and escalate discrepancies, suspected fraud or compliance concerns.

Nominated Supervisors / Responsible Persons / Educators

- Maintain accurate attendance records and promptly communicate discrepancies relevant to CCS reporting.
- Follow safe-arrival, absence and sign-in/sign-out procedures independently of CCS administration.
- Refer CCS account or entitlement queries to authorised Support/Accounts personnel where appropriate.

Families

- Maintain their CCS claim and personal circumstances with Services Australia.
- Provide accurate enrolment and CCS information and confirm enrolments where required.
- Review Statements of Entitlement, notify Cubby OOSH of errors and pay required gap fees and other charges.

STATUTORY LEGISLATION & CONSIDERATIONS

- A New Tax System (Family Assistance) Act 1999 and A New Tax System (Family Assistance) (Administration) Act 1999, as amended.
- Child Care Subsidy Minister's Rules and Secretary's Rules, as amended.
- Education and Care Services National Law (NSW), including current paramountcy requirements where decisions affect children's safety, rights or best interests.
- Education and Care Services National Regulations (NSW), including Regulations 158, 160-162, 177, 181 and 183 as applicable.
- National Quality Standard - Quality Area 7: Governance and Leadership.
- Privacy Act 1988 and Australian Privacy Principles where applicable.

SOURCES

- Australian Government Department of Education - Child Care Provider Handbook, current 2026 edition.
- Australian Government Department of Education - Child Care Subsidy provider guidance, including the 3 Day Guarantee, absences, session reporting and gap fees.
- Services Australia - Child Care Subsidy information for families.
- ACECQA - Guide to the National Quality Framework.

7.13 Governance & Service Management Policy

INTRODUCTION

Effective governance and leadership are essential to the safe, lawful and high-quality operation of Cubby OOSH. Governance establishes clear accountability, decision-making, risk management, financial and administrative systems, child safe practices and continuous improvement. Service management translates these systems into consistent day-to-day practice across before school care, after school care and vacation care.

PURPOSE

Cubby OOSH aims to maintain governance and leadership systems that support a quality OOSH service that is child safe, ethically managed, financially responsible and continuously improving. Governance decisions will comply with the Education and Care Services National Law and Regulations, Family Assistance Law where applicable, the National Quality Standard and My Time, Our Place V2.0.

SCOPE

This policy applies to the Approved Provider, persons with management or control, Nominated Supervisors, Responsible Persons, Educational Leaders, management, educators, staff, volunteers and students involved in Cubby OOSH services.

PARAMOUNT CONSIDERATION - CHILDREN'S SAFETY, RIGHTS AND BEST INTERESTS

The safety, rights and best interests of children are the paramount consideration in all decisions and actions relating to the provision of education and care. Governance systems, budgets, staffing, policies, risk decisions, complaints, recruitment, operational priorities and business decisions must therefore place children ahead of competing financial, organisational, reputational or adult interests.

Where interests conflict, Cubby OOSH will identify the conflict, consider the impact on children, choose the option that best protects children's safety, rights and best interests, document significant decisions where appropriate, and review whether further safeguards are required.

GOVERNANCE PRINCIPLES

- Child safe governance: leadership actively promotes a culture in which child safety is understood as everyone's responsibility and is embedded in decision-making, systems and everyday practice.
- Clear accountability: roles, delegations, reporting lines and decision-making authority are defined and understood.
- Lawful and ethical management: decisions comply with applicable legislation, regulations, funding requirements, professional standards and Cubby OOSH policies.
- Risk management: foreseeable risks to children, staff, service continuity, information, finances and compliance are identified, assessed, controlled and reviewed.
- Transparency and integrity: records, decisions and financial processes are accurate, accountable and capable of review.
- Continuous improvement: self-assessment, feedback, incidents, complaints, compliance information and reflective practice are used to strengthen the service.

- Participation: children, families and educators are provided meaningful opportunities to contribute to decisions that affect the service and its program.

IMPLEMENTATION

Approved Provider / Persons with Management or Control

The Approved Provider retains ultimate responsibility for ensuring the service operates in accordance with the National Law, National Regulations and other applicable legislation. Responsibilities include:

- maintaining provider and service approvals and ensuring prescribed notifications are made to the NSW Early Learning Commission within required timeframes;
- ensuring the service operates within its approved capacity, conditions of approval and applicable staffing requirements;
- appointing appropriately suitable and eligible Nominated Supervisors, Educational Leaders and other required responsible persons;
- ensuring roles and responsibilities are clearly defined and that staff understand the management and escalation structure;
- providing sufficient staffing, resources, systems, equipment and support to enable safe and effective OOSH operation;
- maintaining systems to ensure required child protection and child safety training, Working with Children Checks and other prescribed suitability requirements are current;
- maintaining effective financial management, Family Assistance Law/CCS compliance where applicable, insurance, funding and accountability systems;
- ensuring policies and procedures required under Regulation 168 are current, accessible, implemented, monitored and reviewed;
- ensuring families receive required notification of prescribed changes to policies and procedures;
- ensuring privacy, confidentiality, records management and information security systems comply with legal requirements;
- monitoring compliance, incidents, complaints, risks, audit findings and service performance and ensuring corrective action is completed;
- supporting a culture in which concerns can be raised without retaliation and child safety concerns are acted on promptly;
- ensuring conflicts of interest are identified and managed with children's safety, rights and best interests as the paramount consideration.

Nominated Supervisor / Responsible Person

- provide day-to-day leadership consistent with the service philosophy, National Law, National Regulations and Cubby OOSH policies;
- ensure children are adequately supervised, accurately accounted for and provided with a child safe environment;
- ensure educators understand and implement current policies, procedures, risk assessments, emergency arrangements and child protection responsibilities;
- maintain effective communication with management, families, schools and relevant professionals within privacy and authorisation requirements;

- identify hazards, emerging risks, incidents, complaints or compliance concerns and escalate them promptly;
- support educator induction, mentoring, professional learning, wellbeing, accountability and performance;
- ensure required records are accurate, complete, secure and available when needed;
- support self-assessment, the Quality Improvement Plan or NSW Self-Assessment Working Document, and implementation of improvement actions;
- ensure a Responsible Person is present whenever the service is educating and caring for children as required.

Educational Leadership

Cubby OOSH will designate an Educational Leader in accordance with the National Regulations. The Educational Leader will be supported to lead the development and implementation of the educational program and assessment and planning cycle using My Time, Our Place V2.0. Educational leadership will reflect the leisure-based nature of OOSH and promote children's agency, play, relationships, wellbeing, inclusion, participation and connection with family, school and community.

Child Safe Governance and Culture

- Governance systems will actively prevent, identify and respond to risks of abuse, neglect, inappropriate conduct and harm.
- Child protection concerns, allegations, complaints and incidents will be managed under the relevant Cubby OOSH policies and statutory reporting pathways.
- Management will ensure staff, volunteers and students know how to identify, escalate and report child safety concerns and understand the paramount consideration.
- Recruitment, induction, supervision, performance management and professional development will incorporate child safe expectations.
- Required child safe environment, digital technology and online environment controls will be implemented and monitored.
- Children will be supported to understand their rights, express concerns, participate in decisions and identify trusted adults.

Risk Management and Internal Controls

- Service risks will be identified through risk assessments, incident and complaint reviews, audits, inspections, staff consultation, family feedback and regulatory guidance.
- Controls will be proportionate to the risk and reviewed when circumstances change or following an incident, near miss, complaint or identified weakness.
- Management will maintain appropriate separation of duties, approvals and oversight for financial, payroll, purchasing, CCS and other high-risk administrative functions where practicable.
- Significant compliance or child safety risks will be escalated to senior management and the Approved Provider without unreasonable delay.
- Corrective actions will identify responsibility and reasonable completion timeframes and will be followed through to closure.

Service Philosophy

- The service philosophy will guide all aspects of Cubby OOSH operations and practice.
- It will reflect the OOSH context, My Time, Our Place V2.0, children's rights, inclusion, Aboriginal and Torres Strait Islander perspectives, relationships, play and leisure, family and community partnerships and child safe practice.
- Children, families, educators and staff will be provided opportunities to contribute to its development and review.
- The philosophy will be reviewed regularly and whenever significant changes to the service or relevant requirements indicate review is needed.

Policies and Procedures

- Required policies and procedures will be maintained in accordance with Regulation 168 and other applicable provisions.
- Policies will be accessible to staff and families and implemented in practice, not treated solely as administrative documents.
- Management will monitor policy implementation through induction, meetings, observations, audits, incident reviews, compliance checks and reflective practice.
- Policies will be reviewed at least annually as part of Cubby OOSH's review cycle, and earlier where legislation, regulatory guidance, incidents, complaints, risks or service changes require it.
- Families will receive notice of changes where required by Regulation 172.

Self-Assessment, Quality Improvement and Review

- Cubby OOSH will maintain an ongoing self-assessment and quality improvement process consistent with NSW and National Quality Framework requirements.
- The service's self-assessment/QIP documentation will identify strengths, areas for improvement and the service philosophy and will be reviewed at least annually and updated as improvement occurs.
- Compliance history, feedback from children and families, educator reflection, incidents, complaints, risk assessments and assessment and rating feedback will inform improvement priorities.
- Improvement actions will be allocated, monitored and evaluated for impact rather than treated as a checklist exercise.

Professional Leadership and Workforce Development

- Educators and staff will receive clear position descriptions, induction, expectations, supervision and access to relevant policies and procedures.
- Performance and professional development will be regularly discussed and supported through feedback, mentoring, training and individual development planning.
- Management will promote respectful communication, psychological safety, teamwork and a culture in which educators can raise concerns and seek assistance.
- Delegation does not remove accountability. A person who delegates a task must ensure the person is capable, authorised where required and appropriately supported.

Ethical Decision-Making and Conflicts of Interest

Decisions will be lawful, evidence-informed, transparent and consistent with Cubby OOSH values and policies. Actual, potential or perceived conflicts of interest must be disclosed and managed. No financial, employment, personal, reputational or organisational interest may override the paramount consideration of children's safety, rights and best interests.

Confidentiality, Privacy and Information Governance

- Personal, sensitive and confidential information will only be accessed, used, disclosed and retained for legitimate service, legal or authorised purposes.
- Records will be protected against unauthorised access, loss, alteration or disclosure and retained for applicable statutory periods.
- Access to digital systems will be role-appropriate and reviewed when staff roles change or employment ends.
- Confidentiality obligations continue after a person's employment, engagement or governance role ends.
- Information relating to child safety concerns will be recorded objectively, securely and shared only with people who are authorised or legally entitled to receive it.

Financial Governance and Family Assistance Law

- Cubby OOSH will maintain sound financial controls and ensure the service remains capable of meeting its lawful obligations.
- Where the service is approved for Child Care Subsidy, specified personnel and other relevant persons will meet applicable Family Assistance Law suitability, fit and proper, reporting and record-keeping requirements.
- CCS, ACCS, fee, attendance and enrolment information will be managed in accordance with the current Child Care Provider Handbook, Family Assistance Law and Cubby OOSH's Child Care Subsidy and Fee and Debt Management policies.
- Suspected fraud, misuse of public funds or material financial irregularity will be escalated and managed in accordance with legal and organisational requirements.

Records and Notifications

- Records required under the National Law and Regulations will be accurate, complete, secure, retrievable and retained for the required period.
- The Approved Provider will maintain systems to identify matters requiring notification to the NSW Early Learning Commission, Australian Government departments, child protection authorities, the Office of the Children's Guardian, Police or other bodies as applicable.
- Prescribed notifications will be made within the applicable statutory timeframe and supported by accurate records.
- Child safety and wellbeing records will be clear, objective, thorough and managed in a way that supports accountability and future review.

RESPONSIBILITIES OF EDUCATORS, STAFF, VOLUNTEERS AND STUDENTS

- comply with Cubby OOSH policies, procedures, lawful directions and role responsibilities;

- place children's safety, rights and best interests first in decisions and actions;
- maintain professional boundaries, confidentiality and child safe conduct;
- participate in induction, mandatory training, meetings, reflective practice and continuous improvement;
- report hazards, incidents, complaints, child protection concerns, policy breaches and compliance risks promptly;
- maintain accurate records relevant to their role and cooperate with audits, reviews and investigations.

STATUTORY LEGISLATION & CONSIDERATIONS

- Children (Education and Care Services National Law Application) Act 2010 (NSW) and Education and Care Services National Law, including the paramount consideration of children's safety, rights and best interests.
- Education and Care Services National Regulations (NSW), including Regulations 55-56, 118, 168, 170-173, 177, 181 and 183, as applicable.
- National Quality Standard - Quality Area 7: Governance and Leadership, including Standards 7.1 and 7.2.
- My Time, Our Place: Framework for School Age Care in Australia V2.0.
- Family Assistance Law and Child Care Subsidy requirements, where applicable.
- Child Protection (Working with Children) Act 2012 (NSW), Children's Guardian Act 2019 (NSW), Work Health and Safety Act 2011 (NSW), Privacy Act 1988 (Cth) where applicable, and other relevant NSW child protection and privacy requirements.

SOURCES

- ACECQA - Guide to the National Quality Framework, 2026.
- ACECQA - Quality Area 7: Governance and Leadership.
- ACECQA - Understanding Paramount Consideration information sheet.
- ACECQA - NQF Child Safe Culture guidance and 2026 child safety reforms.
- NSW Early Learning Commission - child safety, paramountcy, regulatory and compliance guidance.
- Australian Government Department of Education - Child Care Provider Handbook.
- Early Childhood Australia - Code of Ethics.

CUBBY OOSH – QUALITY AREA 7 POLICY UPDATE REGISTER

OOSH focused policy review: September 2026

Source	URL
ACECQA – Quality Area 7 Governance and Leadership	https://www.acecqa.gov.au/nqf/national-quality-standard/quality-area-7-governance-and-leadership
ACECQA – Quality Area 7 overview	https://www.acecqa.gov.au/quality-area-7-governance-and-leadership-2
ACECQA – Quality Area 7 information sheets	https://www.acecqa.gov.au/information-sheets-quality-area-7
NSW – National Quality Framework information	https://education.nsw.gov.au/early-childhood-education/regulation-and-compliance/about-the-national-quality-framework

Policy	What changed – September 2026 OOSH update
7.01 Communication Policy	Updated OOSH communication across children, families, educators, schools and management; strengthened child voice; privacy/digital communication; safe handovers and information sharing; MTOP V2.0; relevant paramountcy.
7.02 Philosophy Policy	Made OOSH-specific and aligned with MTOP V2.0; strengthened philosophy as a living document; child/family participation; inclusion; Aboriginal and Torres Strait Islander perspectives; child-safe practice; ongoing review; relevant paramountcy.
7.03 Assessment & Rating Process Policy	Updated NSW assessment and rating/self-assessment approach; Self-Assessment Working Document/QIP and annual review; evidence and continuous improvement; current Exceeding themes; child-safe governance; relevant paramountcy.
7.04 Security of Child Portfolios Policy	Updated OOSH documentation expectations; privacy/confidentiality; secure paper/digital storage; role-based access; current device/image restrictions; MTOP V2.0; relevant paramountcy.
7.06 Acceptance & Refusal of Authorisations Policy	Updated authorisation and refusal criteria for medication, medical treatment, collection, excursions and transport; electronic authorisations; identity/authority checks; records; paramountcy where an authorisation could compromise safety, rights or best interests.
7.07 Enrolment Procedure	Rewritten for OOSH enrolment/bookings; removed outdated Priority of Access; updated information/authorisations; inclusion and reasonable adjustments; CCS 3 Day Guarantee; school-age immunisation position; orientation; safe arrival; privacy/records; paramountcy for enrolment/access decisions.

7.08 Return to Care Following Illness & Infectious Disease Policy	Replaced obsolete COVID relief-era policy; current illness/infectious disease approach; NSW COVID return-to-care position; symptom-based return; exclusions; infectious disease notifications; confidentiality; unwell children at OOSH; reasonable adjustments; relevant paramountcy.
7.09 Waiting List Policy	Removed outdated mandatory Priority of Access categories; fair and transparent OOSH waitlist; clarified CCS 3 Day Guarantee does not guarantee a place; disability inclusion/reasonable adjustments; child safety/wellbeing, continuity, siblings, school transitions and capacity; privacy/complaints; relevant paramountcy.
7.10 Arrival & Departure of Children Policy	Updated BSC/ASC/vacation care arrival and departure; Safe Arrival policy and risk assessment; duty-of-care transfer; immediate unexplained non-arrival process; lawful release; authorised collectors; court orders; unsafe collectors; late/uncollected children; attendance and school-transition supervision; paramountcy.
7.11 Fee and Debt Management Policy	Updated billing, debt, hardship, payment plans, overdue accounts, termination and privacy; removed conflicting/outdated fee/withdrawal wording; added $10 per child Non-Notification of Absence Fee and safety rationale for educators locating/chasing an expected child; exceptional-circumstance discretion; fee-change notice requirements; relevant paramountcy.
7.12 Child Care Subsidy Policy	Updated current CCS requirements; removed Child Care Benefit/outdated processes; added 3 Day Guarantee from 5 Jan 2026; CWA; session reporting; allowable absences; electronic gap-fee collection; Statements of Entitlement; ACCS; specified personnel/fit and proper; PRODA/access; fraud/audit; privacy and records; relevant paramountcy for ACCS/child safety.
7.13 Governance & Service Management Policy	Substantially rewritten OOSH-only; MTOP V2.0; strengthened Approved Provider, Nominated Supervisor, Responsible Person and Educational Leader roles; child-safe governance; risk/internal controls; policy oversight; self-assessment/QIP; workforce development; conflicts; privacy; financial/CCS governance; records/notifications; embedded 2026 paramountcy.